



## APPENDIX Z

### PRIVACY POLICY

#### 1 Introduction

- 1.1 GK Group (Green & Kassab Holdings Limited) incorporating Low Carbon Europe Limited and Green & Kassab Limited (ta GK Transformation) are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of website visitors and service users – determining the means and purpose of the processing of that personal data.
- 1.3 When someone visits [www.lowco2.eu](http://www.lowco2.eu) or [www.gktransformation.com](http://www.gktransformation.com) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.
- 1.4 In this policy “we”, “us” and “our” refer to GK Group incorporating Low Carbon Europe Limited and GK Transformation. For more information about us see Section 14 below.

#### 2 How we use our personal data

- 2.1 In this section 2 we have set out:
  - a) the general categories of personal data that we may process
  - b) the purposes for which we may process personal data and
  - c) the legal bases of the processing
- 2.2 **Usage Data** - We may process data about your use of our website and services. The usage data is collected through Google Analytics and may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation paths. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.
- 2.3 **Account Data** - We may process your account data which may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of providing our services, ensuring the security of our services, maintaining back ups of our databases and



communication with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our business.

- 2.4 **Profile Data** - We may process profile data which may include your name, address, telephone number, email address, profile picture, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for enabling and monitoring your use of our services. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.5 **Service Data** - We may process your personal data that is provided in the course of the use of our services. The service data may include name, address, telephone number, email address, employment details. The source of the service data is either you or your employer. The service data may be processed for the purposes of providing our services, ensuring security of our services, maintaining back ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.6 **Publication Data** - We may process information that you provide for publication on our website or through our services. The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent.
- 2.7 **Enquiry Data** - We may process information contained in any enquiry you submit to us regarding goods and/or services. The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is consent.
- 2.8 **Customer Relationship Data** - We may process information relating to our customer relationships including customer contact information. The customer relationship data may include your name, employer, job role/title, email address, telephone number and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our services to customers. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships.
- 2.9 **Transaction Data** - We may process information relating to transactions, including purchases of services, that you enter into with us. The transaction data may include your contact details and transaction details. The transaction data may be processed for the purposes of supplying services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into



such a contract and our legitimate interests, namely the proper administration of our business.

- 2.10 **Correspondence Data** – We may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content within the communication. The correspondence data may be processed for the purposes of communicating with you and record keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and communications with clients.
- 2.11 **Notification Data** – We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters. The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- 2.12 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out of court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.13 We may process any of your personal data identified in this policy, where necessary, for the purposes of obtaining or maintaining insurance coverage, managing risks or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.14 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary in order to protect your vital interests or the vital interests of another natural person.
- 2.15 Please do not supply any other person's personal data to us, unless we expressly request you to do so.

### 3 Providing Your Personal Data To Others

- 3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out of court procedure. If we do this we will inform the data subject.
- 3.2 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries



insofar as reasonably necessary for the purposes and on the legal bases set out in this policy.

- 3.3 We may disclose your service data to our subcontractors insofar as reasonably necessary for the purposes and the legal bases set out in this policy.
- 3.4 Financial transactions relating to our services are handled by our payment service provider, HSBC Bank Plc. We shall share transaction data with our payment services provider only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find details about our payment services providers' privacy policies and practices at <https://www.business.hsbc.uk/en-gb/search?query=privacy+policy>.
- 3.5 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out of court proceedings.

#### 4 Retaining And Deleting Personal Data

- 4.1 This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.3 We will retain your personal data as follows:-
- a) Names and email addresses will be retained for a minimum period of 18 months following the date of collection and for a maximum period of 3 years following the date of collection.
  - b) Financial records will be retained for a minimum period of 5 years following the date the contract was completed and for a maximum period of 8 years following the date the contract was completed and
  - c) Contracts will be retained for a minimum period of 18 months following contract completion and for a maximum period of 6 years following contract completion.



4.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:-

- a) The period of retention of names, addresses, contact preferences and any financial records relating to the data subject will be determined on the relationship the data subject has with GK Group at any given time.

4.5 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

## 5 Security Of Personal Data

5.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

5.2 The following personal data will be stored by us in encrypted form – your name, contact information.

5.3 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure and we cannot guarantee the security of data sent over the internet.

## 6 Amendments

6.1 This Privacy Policy may be updated from time to time. Any changes will be notified on our website together with publication.

6.2 You should our website periodically to ensure you remain happy with any changes we might make to this policy.

## 7 Your Rights

7.1 We have summarised your rights, under Data Protection Law, within this section. Some of your rights under the Data Protection Law are complex and we have, therefore, not included all of the details within our summary. For a full explanation of your rights you should read the relevant laws and guidance from the regulatory authorities.

7.2 Under the Data Protection Law you have the following principal rights:-

- a) **Right to access** – You have the right to request confirmation of whether or not we process your personal data. You also have the right of access to that personal data together with the purposes of processing, categories of



personal data concerned and the recipients of the personal data. We will supply you with a copy of your personal data provided the rights and freedoms of others are not affected. First requests for a copy of your personal data will be provided free of charge, however, all subsequent requests may be subject to a reasonable administration charge.

- b) **Right to rectification** – You have the right to have any inaccurate personal data we hold about you rectified and, having taken into account the purposes of processing, any incomplete personal data updated and completed.
- c) **Right to erasure** – You have the right to request your personal data be erased without unnecessary delay in certain circumstances. Such circumstances include:-
- The personal data is no longer necessary for the purpose it was originally collected or processed;
  - You withdraw your consent for consent-based processing;
  - You object to the processing of your personal data under certain applicable rules of Data Protection Law;
  - Processing is for direct marketing purposes; and
  - Such personal data has been unlawfully processed.

Exclusions to the right of erasure, where processing is necessary, include:-

- Exercising the right of freedom of expression and information;
- Compliance with legal obligations; or
- For establishment, exercise or defence of legal claims.

- d) **Right to restrict processing** – You have the right to restrict the processing of your personal data in certain circumstances. Those circumstances include:-
- You contest the accuracy of the personal data we hold;
  - The processing of your personal data is unlawful but you oppose erasure;
  - We no longer require your personal data for the purposes of processing but you require personal data for the establishment, exercise or defence of legal claims; and
  - You have exercised your right to object to processing, pending the verification of that objection.

Where processing has been restricted we will continue to store your personal data, however, this will only be processed as follows:-

- With your consent;
- For the establishment, exercise or defence of legal claims;



- For the protection of the rights of another natural or legal person;
- For the reason of important public interest.

e) **Right to object to processing** – You have the right to object to our processing of your personal data as follows:-

- In relation to your personal situation but only to the extent that the legal basis for processing is necessary for the performance of a task in the public interest or to exercise any official authority vested in us; or
- The purposes of the legitimate interests pursued by us or a third party;
- For the purpose of direct marketing purposes (including profiling for direct marketing purposes). If you object on these grounds we will cease to process your personal data for this purpose.

If you object to the processing of your personal data we will no longer process such information unless we can demonstrate legitimate grounds for such processing which supersedes your interests, rights and freedoms or such processing is for the establishment, exercise or defence of legal claims.

f) **Right to data portability** – Where the legal basis for our processing of your personal data is:-

- Consent; or
- Processing is necessary for a contract to which you are party; or
- Such processing is carried out by automated means

You have the right to receive your personal data in a structured, commonly used and machine-readable format. However, this does not apply where this would adversely affect the rights and freedoms of others.

g) **Right to complain to a supervisory authority** – You have the right to make a complaint with a statutory authority responsible for data protection if you consider our processing of your personal data infringes data protection laws. You can lodge a complaint in the EU member state where you are resident, work or the place where the alleged infringement took place.

h) **Right to withdraw consent** – Where consent is the legal basis for our processing of your personal data you have the right to withdraw such consent at any time. Withdrawal does not affect the lawfulness of the processing of your personal data before such withdrawal.

7.3 You may exercise any of your rights in relation to your personal data by written notice to us.





## 8 Third Party Websites

- 8.1 Our website includes hyperlinks and details of third party websites.
- 8.2 We have no control over and are not responsible for the privacy policies or practices of third parties.

## 9 Updating Information

Should any of your personal information, held by us, require updating or correction please let us know.

## 10 About Cookies

- 10.1 A cookie is a file which contains an identifier made up of a string of letters and numbers which is sent from a web server to a web browser. This information is then stored by the browser and the identifier is sent back to the server each time the browser requests a page from the server.
- 10.2 Cookies may be either “persistent” or “session” cookies. Persistent cookies are stored by a web browser and remain valid until either their set expiry date or are deleted by the user prior to expiry. A session cookie expires once the session has ended and the web browser has been closed.
- 10.3 Cookies do not usually contain any personal information which may identify the user.

## 11 Cookies We Use

- 11.1 We use Cookies for the following:-
- a) Statistics – we use cookies that register a unique ID which is used to generate statistical data regarding visitor usage of our website. The cookies used for this purpose are `_ga`; `_gat`; `_gid`.

## 12 Cookies Used By Our Service Providers

- 12.1 Cookies used by our service providers may be stored on your computer when visiting our website.
- 12.2 We use Google Analytics for statistical analysis of the use of our website. Google Analytics uses cookies to gather information about our website. We use the information gathered to compile reports about our website usage. These cookies are `_ga`; `_gat`; `_gid`. Google’s privacy policy can be found at <https://www.google.com/policies/privacy/>.





### 13 Cookie Preferences

- 13.1 Most browsers allow you to allow, refuse or delete cookies. The means of setting these preferences varies from browser to browser and versions. However, to date information can be obtained from your web browser provider.
- 13.2 It should be noted that blocking all cookies may have a negative impact upon the usability of many websites.
- 13.3 If you block cookies you may not be able to use all of the features on our website.

### 14 Our Details

- 14.1 This website is owned and operated by GK Group incorporating Low Carbon Europe Limited and GK Transformation.
- 14.2 Low Carbon Europe Limited (registration number: 08451494) and GK Transformation (registration number: 04238613) are registered in England and Wales. Our registered office is The Courtyard, Shoreham Road, Upper Beeding, Steyning, West Sussex, BN44 3TN.
- 14.3 Our principal place of business is at 12A Marlborough Place, Brighton, East Sussex, BN1 1WN.
- 14.4 You can contact us as follows:-
- a) By post to the address above;
  - b) Via our website contact form;
  - c) By telephoning our offices on the number published on our website

### 15 Data Protection Officer

Our data protection officer is: Louise Jackson