

WEBSITE PRIVACY NOTICE

1 Introduction

This privacy notice is provided by GTLK Europe DAC, with company number 512927 and registered office at 2 Hume Street, Dublin 2, Ireland (**GTLK, we, us or our**).

2 Who this notice applies to

This privacy notice applies to different types of individuals including prospective, existing or former clients, business contacts and other persons when you communicate with us through our website (through various domains) and when we communicate with you by email, telephone and by other means.

This privacy notice does not set out our data protection and privacy practices for personal data we process in the course of providing our professional services to our clients (**'Services'**). Our Client Privacy Notice, which we provide to our clients as part of our client on-boarding processes, describes how we control and process our clients' personal data (and, where applicable, that of other persons identified in our AML processes) and should be read in conjunction with this privacy notice. Please use the contact details provided below if you would like to obtain a copy of our Client Privacy Notice.

3 Careers and recruitment

If you submit to us an application for employment or a speculative employment application, whether through our website, in person, through a recruitment agency or otherwise, the personal data we receive will be processed in accordance with our job candidate privacy notice which we furnish when responding to applications for employment. This privacy notice will apply to your general use of our website.

4 The personal data we receive about you

'Personal data' means information about an individual from which that person can be identified. It does not include information where an individual's identity has been removed (anonymous data). Throughout this privacy notice we use the term **'processing'** (and derivatives of this term) to refer to all activities involving your personal data, including collecting, handling, storing, sharing, accessing, using, transferring, erasing and disposing of it.

Where applicable, we will receive and process the following categories of personal data about you:

- **Identity and Contact Data** such as your name, company and/or business name, job title, email address and telephone number.
- **CCTV Data** namely your image and time of recording as captured by CCTV we operate inside our business premises and, if requested by us, as captured by CCTV operated by our landlord outside of our business premises.

We do not request or collect any **special categories of personal data** about you (this is personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership; genetic data; biometric data for the purpose of uniquely identifying an individual or data concerning health or sexual orientation).

5 How we receive your personal data

We may receive your personal data through different sources including:

- **Direct Interactions:** We will receive your Identity and Contact Data when you communicate with us in person or by contacting us by post, telephone, email, SMS, video conference, professional and social media or other means.
- **Third-party sources:** We may receive:
 - Identity and Contact Data about you from professional and social media platforms, internet searches and other publicly available sources.

- CCTV Data about you if we need to request access to CCTV recordings controlled by the owner of our business premises.
- **Automated technologies or interactions:** If you visit our offices at which we operate CCTV, we may collect or obtain CCTV Data that relates to you. Whenever you communicate with us by email or by other electronic means, our IT systems will automatically create a log of our communications.

Other individuals' personal data: If you provide us personal data relating to any individual other than you, you must ensure that you do so in accordance with applicable data protection laws. Please inform those third parties that you intend to disclose their personal data to us, the purpose for this disclosure and that their personal data will be processed by us in accordance with this privacy notice.

6 How we use your personal data

We have set out below a description of the ways we may use your personal data, and which of the legal grounds we rely on to do so.

Purpose / Activity	Type of Data	Legal Grounds
To manage our relationship with you including: (i) responding to communications you submit to us by email, telephone, professional and social media, in person and other means; (ii) arranging, preparing for and attending meetings (in person and remotely); (iii) notifying you of changes to our website and other services; (iii) notifying you of changes to this privacy notice and any other notices or policies published on our website; (iv) managing complaints and disputes; (v) administering your data protection, privacy and other rights; (vi) conducting or exploring any re-organisation of some or all of our business and assets, merger or acquisition.	Identity and Contact Data	<p>Necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests for responding to communications, attracting new clients, running and/or re-organising our business, to develop new business, keeping our records updated and to establish, exercise or defend legal rights.</p>
To administer and protect our business, services, networks, systems, website and data, content and property hosted on or made available through our website including implementing and monitoring security measures, troubleshooting, system maintenance, support and reporting; detecting, investigating, preventing and addressing fraud and other illegal activity; enforcing the legal notices and policies published on our website, any other contract we may have with you and our legal rights and obligations; conduct or assist with internal, government, law	Identity and Contact Data CCTV Data	<p>Necessary for the performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests including for running our business, network security, to identify and/or prevent fraud or any other unlawful activity.</p> <p>Necessary for the purposes of obtaining legal advice or for the purposes of, or in connection with, legal claims, prospective legal claims, legal proceedings or prospective legal proceedings, or is otherwise necessary for the purposes of</p>

enforcement and other investigations, inquiries or actions; comply with our insurance policies and to exercise or defend our legal rights or to comply with court orders or orders by applicable regulators.		establishing, exercising or defending legal rights.
Securing our business premises and the persons and property inside our business premises and/or on surrounding areas.	CCTV Data	Necessary to comply with our legal obligations. Necessary for our legitimate interests to protect our property, assets, staff and others; to detect, investigate, prevent and address unlawful activity and to establish, exercise or defend legal rights.

Cookies: We do not use cookies or other similar tracking technologies (such as pixels, tags, web beacons or local storage) on our website.

Anonymisation: We may anonymise certain of your personal data so that it may be used in conjunction with other anonymised data for statistical and other purposes. We rely upon our legitimate interests to collate statistical information to enhance our services and business. Anonymised data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

7 Disclosure of your personal data

We may have to disclose personal data to the parties set out below for the purposes set out in section 6 above.

- **Service providers:** This includes companies and businesses that provide products and services to us such as professional advisors, providers of information and communications systems, software and support, data storage solutions, IT developers, website hosting providers, software as a service, administration services and other service providers. We do not allow our service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
- **Public and Government Authorities:** This includes law enforcement and entities that regulate or have jurisdiction over us. We may be required to disclose your personal data in order to comply with a legal obligation for example if we are ordered to do so by a court of competent jurisdiction, law enforcement body, regulatory authority or administrative authority. We may also do so where we consider necessary in order to enforce our legal notices and other policies published on our website and other agreements we may have with you, or to protect the rights, property and/or safety of our staff, clients, website users and others.
- **Business reorganisation:** If we acquire other businesses or merge with them it may be necessary for us to disclose your personal data to them and their professional and other advisors in the course of the transaction.

8 International transfers

In some circumstances, it may be necessary for us to process or transfer your personal data outside of the European Economic Area (EEA) for the purposes described in this privacy notice. We comply with Irish data protection law when doing so, such as by ensuring that the country or territory where your personal data will be processed is deemed by the European Commission to have an adequate level of protection for personal data. In some cases, the country or territory where your personal data will be processed may not have an adequacy decision by the European Commission, which means the country or territory is not deemed to provide an adequate level of protection for your personal data. However, to

provide that your personal data does receive an adequate level of protection we have in place measures, namely the European Commission approved model contractual clauses, to provide that your personal data is treated in a way that is consistent with and which respects Irish data protection law. For further information, including details of the specific legal mechanism used to provide for the lawful transfer of your personal data, please use the information provided in the Contact Us section below.

9 Information security

We have in place security measures intended to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Service providers will only process your personal data on our instructions and they are subject to obligations of confidentiality.

10 Retention

We keep your personal data for no longer than is necessary, based on the purposes set out in this privacy notice and for the purposes of complying with any legal, accounting, reporting, regulatory or professional requirements or in order for us to establish, exercise or defend our legal rights. When determining the appropriate period to retain personal data, we consider various factors including relevant regulatory guidance, specific legal or regulatory obligations and applicable statutory limitation periods.

11 Your legal rights

Under certain circumstances, you may have the following rights.

- **Access.** You have the right to request a copy of your personal data we control.
- **Correction.** You can request to have any incomplete or inaccurate personal data we control corrected.
- **Erasure.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, following our receipt of your request.
- **Object.** You may object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you wish to object to processing on this ground because you consider it impacts your fundamental rights and freedoms. You also have the right to object where we process your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.
- **Restriction.** You can ask us to suspend the processing of your personal data in the following scenarios: (i) if you want us to establish its accuracy; (ii) where you consider our use of the personal data is unlawful but you do not want us to erase it; (iii) where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.
- **Data portability.** You can ask us to provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to process or where we processed the personal data to perform a contract with you.
- **Withdraw consent.** If you provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you wish to withdraw your consent, we will take steps to ensure we no longer process your personal data for the purpose(s) you originally

agreed to, unless we have another legitimate basis for doing so in law. Withdrawal of consent will not affect the lawfulness of processing based on consent before withdrawal.

Exercising your rights: In order to exercise one or more of your rights in respect of your personal data, please contact us in writing using the Contact Us details below.

Supervisory Authority: You have the right to make a complaint at any time to the Data Protection Commission (DPC), the Irish supervisory authority for data protection issues (www.dataprotection.ie). We would appreciate the chance to deal with your concerns before you contact the DPC and ask you contact us in the first instance.

12 Updating your personal data

It is important that the personal data we hold about you is accurate and current. Please keep us informed, using the Contact Us details below, if any of your personal data changes during your relationship with us.

13 Third party links

Our website may include links to third party websites. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notices of every website you visit.

14 Changes to this Notice

We will change this privacy notice from time to time and any changes will be contained in a revised privacy notice posted on our website. This version of the privacy notice was updated on 17 December 2020.

15 Contact us

For any matters relating to this privacy notice and your data protection rights please email administration@gtlkeurope.com.