



Ground Truth Holdings Limited

Data Protection and Privacy Policy

This website, gtintel.io, is operated by Ground Truth Holdings Limited, registered in England under company number 12187725 and having its registered office at Congress House 14 Lyon Road, Suite 2, Floor 2, Harrow, United Kingdom, HA1 2EN. In this Policy, we will refer to ourselves as "**we**" or "**us**".

We operate a platform which brings our clients ("**you**") together with members of our network (our "**Network Partners**", also "**you**"). We act on behalf of these clients and Network Partners. This means that we handle and store personal information of our clients and Network Partners as a "processor". We do not have discretion as to what data is stored on the platform, nor do we have rights of use of such data. This is determined by our clients and network partners.

However, there are very limited circumstances in which we are a "controller" for the purposes of data protection law, such as when you use this website and when we create a service relationship with clients and network partners to give them access to our platform. This means that we are responsible for, and control the processing of, personal information provided for these limited cases.

This Policy explains how we use personal information when we act as a controller.

Information which we may collect

We collect personal information about you when you visit our website, contact us using the email addresses on our website, purchase goods or services from us, or otherwise from communications with us. All of the personal information which we store and hold as a data controller is obtained either directly from you or when you use our website.

We may collect the following personal information:

- a) full name;
- b) company name;
- c) email address;
- d) telephone numbers;
- e) details relevant for any products or services you purchase from us;
- f) billing details; and



- g) Log Data (i.e. IP Address, browser type, browser version, the pages of our website you visit, the time and date of your visit, the time spent on those pages, and other usage statistics).

How we use your information

We will collect your personal information for the purposes set out below. We have also indicated below which legal basis we rely on to use your information in this way:

- a) to identify you (*legal basis: in our legitimate interests as a business to identify visitors to our website*);
- b) to respond to any queries which you submit to us by email (*legal basis: in our legitimate interests to use your personal information to respond to your correspondence*);
- c) to register you as a client and provide services to you (including, without limitation, the review of requests for services, agree relevant charges between our network partners and clients (where appropriate), facilitate communication between our network partners and clients)(*legal basis: to perform a contract with you*)
- d) to manage our relationship (including, without limitation, communicating with you on service issues, changes to our terms and / or this Policy, and collecting / recovering any money due to us and monitoring compliance with our contracts) (*legal basis: to perform a contract with you*);
- e) to detect and prevent fraud, and to monitor use of our platform to prevent misuse (*legal basis: to comply with our legal obligations*);
- f) to customise our website and its content to your particular preferences (*legal basis: in our legitimate interests as a business*);
- g) to notify you of any changes to our website or to our services that may affect you (*legal basis: in our legitimate interests as a business*);
- h) to improve the functionality of our website (*legal basis: in our legitimate interests as a business*); and
- i) to send you marketing emails about our products and / or services which we think may be of interest to you – further information is available under "Marketing", below (*legal basis: in our legitimate interests as a business*).

Marketing

If you represent a corporate body (i.e. your email address is a corporate email address), we may periodically send you marketing emails and news about us, or other information which

we think your company may be interested in (such as special offers) using the email address which you have provided.

If you are an individual, we will only send you marketing emails where we have collected your details in the course of a sale (or enquires / negotiations about a sale) of our products or services. In such cases we will only send marketing emails about similar products or services.

In any case, you can opt out of receiving emails from us at any time by clicking on the "unsubscribe" link in any email which we send to you, or by emailing us at support@gtintel.io

How long we will keep your personal information

We will retain your information for no longer than necessary to fulfil the purposes listed above, unless we are required by law to retain your personal information for a longer period. For more information on the retention of your data, please contact info@gtintel.io.

Our approach to information security

To protect your information, we have policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have the necessary security measures in place.

In addition to these operational measures, we also use a range of technologies and security systems to reinforce the policies. To make sure that these measures are suitable, vulnerability tests are run regularly. Audits to identify areas of weakness and non-compliance are routinely scheduled. Additionally, all areas of the organisation are constantly monitored and measured to identify problems and issues before they arise.

Your rights

You have the following rights in relation to the processing of your personal information. In order to process any of the requests listed below, we may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

- [The right to access information we hold about you](#)

At any point you can contact us to request access to information we hold about you as well as why we have that information, who has access to the information and where we got the information.

- [The right to correct and update the information we hold about you](#)

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

- [The right to have your information erased](#)



If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold about you. When we receive your request, we will confirm whether the data has been deleted, or tell you the reason why it cannot be deleted.

- The right to object to processing of your personal information

You have the right to request that we stop processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have lawful grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

- The right to data portability

You have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.

- The right to complain

You can make a complaint to us by contacting us via info@gtintel.io or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

- Consent

If you have given us your consent to use your personal information, you can withdraw your consent at any time. This will not affect the lawfulness of our use of your information before you withdrew your consent.

Sharing your information

We may share your personal information with our Network Partners, but only to the extent that it allows us to provide or improve our services to you. We only share information which is necessary for the performance of the services. We also share personal information with providers of services to us such as data storage companies. We currently use Amazon Web Services for the storage of data.

International Transfers

We may need to transfer your personal information to countries which are located outside the EEA and UK for the purpose of improving our service.

We will take all steps reasonably necessary to ensure that your personal information is handled securely and in accordance with this Policy and the relevant data protection legislation. These include ensuring, where the country does not provide an adequate level of protection, that our overseas suppliers enter into a European Commission approved contract. Some US providers may also be certified under the EU-US Privacy Shield which

confirms they have appropriate measures in place to ensure the protection of your personal information.

Cookies and Tracking

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser. We use both session and persistent Cookies for the purposes set out below:

- Necessary / Essential Cookies
 - Type: Session Cookies
 - Administered by: Us
 - Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.
- Functionality Cookies
 - Type: Persistent Cookies
 - Administered by: Us
 - Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

A full copy of our cookie policy can be found at <https://www.gtintel.io/cookie-policy/>

Automated decision making

We will not use your personal data in any automated processes to make decisions about you or to create a profile about you.

Contact details

If you have any queries about this Policy, need further information or wish to lodge a complaint you can use the details below to contact us at support@gtintel.io or at Congress



House 14 Lyon Road, Suite 2, Floor 2, Harrow, United Kingdom, HA1 2EN marked for the attention of the CTO.

Changes to this Privacy Policy

We may change this Policy from time to time. You should check this Policy occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.