

## Privacy Notice

### 1. Background

This Privacy Notice sets out how Global Investigations Limited, protects the privacy of your personal information.

We need to collect, use and disclose personal information in order to perform our business functions and activities, including managing personal information on behalf of our customers. We are firmly committed to protecting the privacy and confidentiality of personal information and to maintaining various physical, electronic and procedural safeguards to protect personal information in our care.

We will be a “data processor” for the purposes of the General Data Protection Regulation 2018 (“GDPR”) for any personal information you provide to us in connection with our relationship.

By providing personal information to us, you agree that this Notice will apply to how we handle your personal information and you consent to us collecting, using and disclosing your personal information as detailed in this Notice. If you do not agree with any part of this Notice, you must not provide your personal information to us. If you do not provide us with your personal information, or if you withdraw a consent that you have given under this Notice, this may affect our ability to provide services to you or negatively impact the services we can provide to you..

There may be instances where your local data protection laws impose more restrictive information handling practices than the practices set out in this Notice. Where this occurs we will adjust our information handling practices in your jurisdiction to comply with these local data protection laws.

### 2. What personal information do we collect?

Personal information has the meaning given under your local data protection law, and, where the GDPR applies, the meaning of personal data given under the GDPR. Personal information generally means information which relates to a living individual who can be identified from that information, or from that information and other information in a person’s possession, including any expression of opinion, whether true or not, and whether recorded in material form or not,

about an identified or reasonably identifiable individual, and any indication of intention in respect of an individual.

We therefore typically process the following types of personal information about you:

- contact information (such as name, residential/ mailing address, telephone number, email address);
- payment account information (credit/debit card details, including card type, card number, security number and expiry date);

In some circumstances, we may collect personal information from you which may be regarded as sensitive information under your local data protection laws. Sensitive information may include (without limitation) your racial or ethnic origin, philosophical or religious beliefs or affiliations, sexual preferences or practices, criminal record and the alleged commission of an offence, membership of political, professional or trade associations, biometric and genetic information, passwords and financial information and health information. We will only collect sensitive information in compliance with your local data protection laws, with your explicit consent and where it is reasonably necessary for, or directly related to, one or more of our functions or activities, unless we are otherwise required or authorised to do so by law. To the extent permitted or required under your local data protection laws, you consent to us using and disclosing your sensitive information for the purpose for which it was collected, unless we subsequently receive your consent to use it for another purpose.

### **3. How do we collect personal information?**

We will only collect personal information in compliance with your local data protection laws. We usually collect your personal information from the information you submit during the course of your relationship with us. We will collect this information directly from you unless it is unreasonable or impracticable to do so.

Generally, this collection will occur:

- when you deal with us either in person, by telephone, letter, email;
- when you visit any of our websites; or
- when you connect with us via social media.

We may collect personal information about you:

- when you purchase or make enquiries about tracing an individual or other products and services;
- when you request brochures or other information from us; or
- when you provide information, or use our services, on social media.

Unless you choose to do so under a pseudonym or anonymously, we may also collect your personal information (other than sensitive information) when you complete surveys or provide us with feedback.

In some circumstances, it may be necessary for us to collect personal information about you from a third party. Where you make an enquiry on behalf of another person booking made for and you agree you have obtained the consent of the other person, use and disclose the other person's personal information in accordance with this Notice and that you have otherwise made the other person aware of this Notice.

You should let us know immediately if you become aware that you're personal information has been provided to us by another person without your consent or if you did not obtain consent before providing another person's personal information to us.

We make every effort to maintain the accuracy and completeness of your personal information which we store and to ensure all of your personal information is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your personal information or if you become aware that we have inaccurate personal information relating to you. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal information that you, or a person acting on your behalf, provide to us.

If you have any concerns regarding the transfer of your personal information or you wish to contact us for further information, please refer to us in writing.

The purposes for which we collect personal information further include:

- providing you with services and tools you choose to use identification of fraud or error;
- regulatory reporting and compliance;
- developing and improving our products and services and those of our related entities;
- servicing our relationship with you by, among other things, creating and maintaining a customer profile to enable our brands to service you better or presenting options on our website we think may interest you based on your browsing and preferences;
- involving you in customer satisfaction and seeking feedback regarding our relationship with you and/or the service we have provided;
- for research and analysis in relation to our business and services
- internal accounting and administration;
- to comply with our legal obligations
- Other purposes as authorised or required by law (e.g. to prevent a threat to life, health or safety, or to enforce our legal rights).

## **5. Is personal information disclosed to third parties?**

We do not and will not sell, rent out or trade your personal information. We will only disclose your personal information to third parties in the ways set out in this Notice and, in particular, as set out below, and in accordance with your local data protection laws. Note that, in this Notice, where we say "disclose", this includes to transfer, share (including verbally and in writing), send, or otherwise make available or accessible your personal information to another person or entity.

Your personal information may be disclosed to the following types of third parties:

Our contractors, suppliers and service providers, including without limitation:

- suppliers of IT based solutions that assist us in providing products and services to you (such as any external data hosting providers we may use);
- publishers, printers and distributors of marketing material;
- external business advisers (such as lawyers, accountants, auditors and recruitment consultants);
- our related entities and brands;
- as required or authorised by applicable law, and to comply with our legal obligations;
- various regulatory bodies and law enforcement officials and agencies, including to protect against fraud and for related security purposes; and
- Enforcement agencies where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter.

Other than the above, we will not disclose your personal information without your consent unless we reasonably believe that disclosure is necessary to lessen or prevent a threat to life, health or safety of an individual or to public health or safety or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), or where such disclosure is authorised or required by law (including applicable privacy / data protection laws).

## **6. Is personal information transferred overseas?**

We may disclose your personal information to certain overseas recipients, as set out below. We will ensure that any such international transfers are either necessary for the performance of a contract between you and the overseas recipient or are made subject to appropriate or suitable safeguards as required by your local data protection laws (e.g. GDPR).

It is possible that information will be transferred to an overseas recipient (other than any of our overseas related entities) located in a jurisdiction where you will not be able to seek redress under your local data protection laws and that does not have an equivalent level of data protection as in your jurisdiction. To the extent permitted by your local data protection laws, we will not be liable for how these overseas recipients handle, store and process your personal information.

## **7. Security of information**

We are committed to safeguarding and protecting personal information and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any personal information provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal information

transmitted, stored or otherwise processed. Global Investigations has implemented various physical, electronic and managerial security procedures in order to protect the personal information it holds from loss and misuse, and from unauthorised access, modification, disclosure and interference. Global Investigations regularly reviews security technologies and will strive to protect your personal information as fully as we protect our own confidential information. Global Investigations is not responsible for any third party's actions or their security controls with respect to information that third parties may collect or process via their websites, services or otherwise.

We will destroy or de-identify personal information once we no longer require it for our business purposes, or as required by law.

## **8. Your rights in relation to the personal information we collect**

If you wish to:

- update, modify, delete or obtain a copy of the personal information that we hold on you; or
- restrict or stop us from using any of the personal information which we hold on you, including by withdrawing any consent you have previously given to the processing of such information; or
- where any personal information has been processed on the basis of your consent or as necessary to perform a contract to which you are a party, request a copy of such personal information in a suitable format

You can request this by emailing us at the address set out in section 13 below. You will receive acknowledgement of your request and we will advise you of the timeframe within which you will receive your information pack.

We endeavour to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

We reserve the right to deny you access for any reason permitted under applicable laws. Such exemptions may include national security, corporate finance and confidential references. If we deny access or correction, we will provide you with written reasons for such denial unless it is unreasonable to do so and, where required by local data protection laws, will note your request and the denial of same in our records.

Further correspondence regarding your request should only be made in writing to the Data Protection Officer at the address set out in section 13 below.

Please note that, if you request that we restrict or stop using personal information we hold on you, or withdraw a consent you have previously given to the processing of such information, this may affect our ability to provide services to you or negatively impact the services we can provide to you.

You must always provide accurate information and you agree to update it whenever necessary. You also agree that, in the absence of any update, we can assume that the information submitted to us is correct, unless we subsequently become aware that it is not correct.

In any of the situations listed above, we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of personal information.

We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your personal information, and for any additional copies of the personal information you request from us.

## **9. Social Media Integrations**

Our websites and mobile applications may use social media features and widgets (such as “Like” and “Share” buttons/widgets) (“**SM Features**”). These are provided and operated by third party companies (e.g. Facebook) and either hosted by a third party or hosted directly on our website or mobile application. SM Features may collect information such as the page you are visiting on our website/mobile application, your IP address, and may set cookies to enable the SM Feature to function properly.

If you are logged into your account with the third party company, then the third party may be able to link information about your visit to and use of our website or mobile application to your social media account with them. Similarly, your interactions with the SM Features may be recorded by the third party. In addition, the third party company may send us information in line with their policies, such as your name, profile picture, gender, friend lists and any other information you have chosen to make available, and we may share information with the third party company for the purposes of serving targeted marketing to you via the third party social media platform. You can manage the sharing of information and opt out from targeted marketing via your privacy settings for the third party social media platform.

Your interactions with these SM Features are governed by the privacy policy of the third party company providing them. For more information about the data practices of these third party companies, and to find out more about what personal information is collected about you and how the third party uses such personal information, please refer to their privacy policy directly.

## **10. IP addresses**

When you access our website, use any of our mobile applications or open electronic correspondence or communications from us, our servers may record data regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer, and which are generally assigned when you access the internet.

We may use IP addresses for system administration, investigation of security issues and compiling anonymised data regarding usage of our website and/or mobile applications. We may

also link IP addresses to other personal information we hold about you and use it for the purposes described above (e.g. to better tailor our marketing and advertising materials, provided you have opted in to receive electronic marketing).

### **11. Tracking Technologies / Cookies**

We may use third-party web analytics services on our websites and mobile apps, such as those listed in our Cookies Policy. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

For information regarding our use of cookies and tracking technologies, refer to our Cookies Policy on our website.

### **13. Feedback / Complaints / Contact**

If you have any enquiries, comments or complaints about this Notice or our handling of your personal information, or wish to inform us of a change or correction to your personal information, would like a copy of the information we collect on you or would like to raise a complaint or comment, please contact your consultant or the Compliance Manager using the details set out below:

**Email:** [info@tracing.com](mailto:info@tracing.com)

**Post:** Global Investigations Ltd, First Floor, 44 Richmond Road, Kingston upon Thames, Surrey, United Kingdom KT2 5EE

We will respond to any enquiries or complaints received as soon as practicable.

### **14. Changes to our Notice**

We may amend this Notice from time to time. If we make a change to the Notice, the revised version will be posted on our website. We will post a notice on our website to notify you of any significant changes to our Notice and indicate at the end of the Notice when it was most recently updated. It is your responsibility, and we encourage you, to check the website from time to time in order to determine whether there have been any changes. If we update our Notice, in certain circumstances, we may seek your consent.

This Privacy Notice was last updated on 14 May 2018