

Gurkha Resource Company Ltd Privacy & Cookie Policy

The Gurkha Resource Company Ltd (GRC) is committed to respecting the privacy of all visitors to its website and of its clients and contacts. You are invited to read the following privacy & cookie policy to understand how we protect and use and the information that you provide to us or that we retain about you. This will help you to understand what your rights are in relation to information that we hold.

This policy applies to information about living identifiable individuals only.

Information gathered from our website

You may choose to provide personal information to us when you register on our website to ask us to contact you or provide general information about our services. You may be asked to provide information about yourself including (but not necessarily limited to) your name, title, postal address, telephone number and/or email address.

Information gathered to offer financial services

If you contact us and request information or become a client of GRC, we will need to obtain basic information to confirm your preferred means of communication, including your name, title and postal address, together with normal contact details for you and any other parties that will be included in any products or services we provide. The information that we need will be explained to you by your financial advisor and/or set out in our client engagement information, depending on the nature of your enquiry or requirements.

Information gathered automatically

We may also collect information automatically about your access and usage of our website using cookies and other analytical technology. Full details of our data collection methods are included in the 'Cookie' section below. We will use your IP address, which is a numeric code that identifies a computer on the internet, to collect internet traffic data and information on your browser type and computer. If you do not wish to receive cookies, you may reject them by amending your browser settings, unless they are required for the delivery of our website or services to visitors.

Information gathered from third parties

Additionally, we may obtain information about you from legitimate third parties, including suppliers and partners that are relevant to your enquiry.

How does GRC use your information?

We will use your information for the specific purpose(s) for which it has been provided or collected by us, including:

- to provide information that you may request regarding the services we offer
- to contact you to introduce our products and services
- to comply with our statutory and regulatory obligations
- to verify your identity for financial compliance purposes
- to deal with any feedback, queries or complaints that you may have

We may also use the information that we collect about you for marketing and business development purposes, including:

- to provide information about GRC and the services we provide, which may be of interest to you, by sending you newsletters or business updates
- to provide you with updates on relevant areas of our services
- to contact you about other activities and events that we may undertake

Information gathered by cookies and similar analytical technologies are used to measure and analyse information on visits to our website, to update the website to improve the visitor experience and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

Furthermore, we may use your information to administer, support and improve our business generally and to enforce our legal rights.

Legitimate grounds for processing your information

We must have a lawful basis for processing your information. This will vary depending on the circumstances for obtaining your information, but will typically include:

- the activities are within our legitimate interests as a security and cleaning services company seeking to engage with and provide services to prospective and current clients
- you have given consent for us to process your information in relation to our marketing activities
- we are completing necessary steps in relation to a contract to which you are a party or prior to you entering into a contract with GRC, because you wish to instruct us to carry out financial services activities for you
- the processing is necessary for compliance with legal obligations that we are subject to, including confirming your identity under our financial compliance requirements

If we legitimately process any special categories of information, which may reveal racial or ethnic origin; political opinions; religious or philosophical beliefs or trade union membership; processing

of genetic or biometric data for the purpose of uniquely identifying individuals; health data or data concerning your sex life or sexual orientation, we must have a further lawful basis for the completion of the processing activities, which may include:

- where you have given us your explicit consent to do so
- where the processing is necessary to protect your vital interests or someone else's vital interests
- where you have made the information public
- where the processing is necessary for the establishment, exercise or defense of legal claims
- · where the processing is necessary for reasons of substantial public interest

Marketing

If you become a client of GRC, we may use your personal information to send you information that we think may be of interest to you. This falls within our legitimate interests as a security and cleaning services company to use your information for marketing purposes.

You will be given the opportunity to confirm whether or not you wish to receive direct marketing materials and communications from us, either at the time you provide your details and/or within the marketing communication itself.

At any point, if you change your mind about being contacted by us, or any of your personal details change, or you believe that any information we hold about you is either inaccurate or out-of-date, please contact us by emailing <u>info@gurkharesourcecompany.com</u> or you can call us on 07368 695157.

Disclosure of your information

The information you provide to GRC will usually be held on our computers in the UK and accessed by staff working in the UK. Information you provide to us may be transferred to, stored or processed by third party organisations which process data on our behalf. These third parties may store or process your information in the UK or elsewhere, including outside the EEA. These third parties may include suppliers of products and services, administrative and support services, suppliers of other specialist products or outsourced IT applications and systems, including cloudbased platforms.

We may also transfer your information to other organisations with whom we are working with.

Additionally, we may be obliged to disclose information under certain laws, by order of court or other competent regulatory body or may be permitted to disclose it under applicable data protection laws.

Finally, if GRC merges with another business entity, divests part of its business or carries out internal corporate restructuring, your information may be disclosed to GRC's new business partners or owners or the new corporate entities.

We will take all reasonably practicable measures to ensure that your data is treated securely and in accordance with this privacy policy.

Protection of your information

We have implemented relevant administrative, technical and physical controls for our website, which are designed to mitigate the risk of loss, misuse, unauthorised processing or disclosure of the personal information that we hold. Where we transfer information to third parties to enable them to process it on our behalf, we ensure that these third parties can meet or exceed relevant legal or regulatory requirements for transferring and securing information under their control.

We will also ensure that where information is transferred to a country or international organisation outside of the UK / EEA, we will comply with the relevant legal rules governing such transfers.

We will retain your personal information for no longer than necessary for the purposes that it was collected. Details of our information retention policy is available upon request. Our terms of business include details of how we keep clients' personal information secure.

Your rights

You have certain rights in relation to your personal information. However, these rights do not apply in all cases or to all information that we hold about you. In certain circumstances, we may need to continue to hold and process information to establish, exercise or defend our legal rights.

You have the right to request that we:

- Provide you with a copy of the personal information that we hold
- Update your personal information where it is incorrect or out-of-date
- Delete personal information that we hold
- Restrict the way in which we process your information
- Consider any valid objections to our processing of your personal information
- Provide information you have given to us to a third-party provider of services, where our lawful basis for processing is consent and where processing is automated

We will respond to your request, including providing information on whether the rights apply in the particular circumstances, within the statutory time period. If we are unable to confirm your identity, we may require you to provide further information in order for us complete verification of your identity.

Changes to this policy

We may make changes to this policy from time to time as our business, internal practices or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purposes for which it was obtained or otherwise than is permitted by applicable law. If we intend to use your information for any other purposes, we will notify you in advance, wherever possible.

How to contact us

If you would like to contact us to discuss this policy or how we use your personal information, to exercise your rights, to provide feedback or make a complaint about use of your information, please contact us as follows:

- Sulav Gurung Director and Data Protection Manager
- info@gurkharesourcecompany.com or 07368 695157

You can also contact the Information Commissioner's Office for information, advice or to make a complaint. The ICO can be contacted online at https://ico.org.uk

Cookies

Cookies, including browsers or tracking cookies, are small text files that are added to your computer when you visit a website. They help websites to perform certain functions, including knowing who you are if you log into a restricted part of a website and for tracking purposes.

At GRC we use the following cookies:

Google Analytics

We use Google analytics cookies on the website for tracking purposes. The cookies allow us to understand general traffic to our website, including the number of visitors and length of time on the website. This process collects anonymous data to help us develop the website, make improvements and enhance the user experience.

• Privacy Preferences

We use a tracking cookie, which is added to your computer to remember your cookie preferences, including whether you have allowed or disallowed them.

Client Services

For areas of our website that are password protected, an essential cookie is added to your computer, which is then automatically deleted after your session has ended.

Manage cookies

Shortly after arriving at our website, we will add an 'opt-in' tracking cookie to your computer unless you specify otherwise. If you would like to opt-in or opt-out of using cookies, you can amend this by altering your browser settings. You can review your cookie settings at any time.

If you do opt-out then an opt-out preference cookie will be added to your computer, however if you delete all your cookies or use a different device then you will need to set your cookie preference again. If this is your first visit and you navigate away from this page without specifying your cookies preference, then an 'opt-in' tracking cookie with be added to your computer.

Please note that you cannot opt-out of the deployment of cookies that are necessary for delivery of our website or services to visitors.