

GMB Properties is committed to protecting and respecting your privacy. In this policy, we aim to provide you with information that is concise, transparent and uses clear and plain language. We take your privacy seriously and will only use your personal information to provide the products and services you have requested from us. Please read below for further information on how we use your data.

In line with the General Data Protection Regulation 2018 (“GDPR”), this Privacy Policy explains how we collect, protect, use and share the information you provide to us, and the information we collect in the course of operating our business and our website in respect of our products and services. This policy also outlines the legal basis on which we process your personal data and other information that we are required to provide by the GDPR.

For complete information on GDPR and related topics, visit the Information Commissioner’s Office (“ICO”) website at www.ico.org.uk. The ICO is the UK’s independent regulatory office (national data protection authority) dealing with the Data Protection.

This policy applies to any person registering, using or interacting with GMB Properties website www.gilliebarlow.com (“website”), applications, offline activities, products and services, from any device, and any other instances where GMB Properties collects your personal data.

“Personal data” is information that can be used to identify you, directly or indirectly, alone or together with other information (e.g. full name, contact details, precise location, device IDs, certain cookies).

Data Controller

As applicable, we are the data controller of your personal data. “Data controller” means the person or organisation who decides the purposes for which and the way in which any personal data is processed. GMB Properties is registered with the Information Commissioner’s Office (“ICO”).

Contact Details & Data Protection Officer

We have voluntarily appointed the role of GMB Properties's Data Protection Officer ("DPO") to Gillie Barlow, Director. For any queries or questions on this policy, or to contact the DPO, contact details are as follows: Email: gillie@gilliebarlow.com

Information that you provide to us

GMB Properties may obtain personal information about you because you or other third parties (e.g. a service provider in respect of GMB Properties's products and services) provide it to us, or because the information is publicly available (e.g. on your LinkedIn profile).

The personal data that we may collect and process may include your full name, age, date of birth, gender, contact details, proof of identity and address, nationality, employment, investment history, financial information, bank account details, complaint details and how you interact with our website.

Your personal information will be processed during the following circumstances:

1. Enquiries

When you register on our website (i.e. subscribe or register to any programme, course or membership) or when, in any capacity, you contact us with queries (i.e. via website, phone or e-mail); or respond to our communications or attend our events. Additionally, you will be required to provide personal information in connection with the provision of our products and services to you.

2. Other Parties

If you are a third party (e.g. existing or potential service provider), we may collect or receive your personal information. This applies to individuals or companies.

If you no longer wish to be contacted by GMB Properties, please inform our Data Protection Officer.

Other information that we otherwise collect from you

We use other technologies to collect and store information when you visit our websites (i.e. cookies), including information about the type of device you use to access the website, your IP address and geographic location, the operating system and version, your browser type and the content you view and features you access on our websites. For information about how we use cookies and other technologies (as applicable) and the choices you may have, please see our Cookies Policy.

Our website may contain links to other websites, and other websites may contain a link to GMB Properties's website. This privacy policy only applies to GMB Properties's website. When you link to other websites, you should read their own privacy policies.

What do we use your personal data for?

Your information will enable us to keep you informed of and to supply our products and/or services. By registering on the website, you also agree that we may contact you as necessary. We may use the information we obtain about you as follows:

3. To comply with our legal and regulatory obligations (e.g. record-keeping requirements).
4. To provide products and services.
5. To provide information about important changes, or developments to, as applicable, the website, our products and services and business.
6. To operate and improve our products, services and business.
7. To provide personalised content to you (e.g. tailoring our products and services and our digital customer experience to you).
8. To update and enhance our member records.
9. For advertising, marketing and business development purposes (e.g. to provide you with innovative products and services, including sending you newsletters, updates, marketing communications and other information that may be of interest to you, including via social media and digital channels (e.g. LinkedIn)); to make automated decisions on whether to offer you a product or service.
10. To establish, exercise or defend our legal rights, or for the purpose of any legal proceedings, and for crime prevention (e.g. manage any actual or potential fraud or illegal activity).
11. For our legitimate business interests (e.g. undertaking business research, analysis, due diligence on developers/ experienced women in property, managing the operation of our websites and our business and general analysis for management purposes).

12. To investigate any complaint or expression of dissatisfaction we may receive from you, and to contact you for your views on our services (e.g. survey).
13. To monitor and to keep records of our communications between you and our staff.

Transfers of the personal data outside of the EEA

We may transfer and share, as applicable, your personal data, or part of, with third parties (e.g. a data processor (a “data processor” is a person, or organisation, which processes personal data for the data controller), located outside of the European Economic Area (“EEA”). We will only transfer, or share, your personal data to such parties where the European Commission has decided that the country in question ensures an adequate level of protection, for the rights and freedoms of data subjects in relation to the processing of personal data; and there is a GDPR complaint contract/agreement between GMB Properties and the third party in respect of such transfer.

By providing us with your personal data, you are agreeing to the transfer, storing, and/or processing of your personal data as explained above. Please contact us with any questions you may have regarding such transfers.

How we share information with third parties

We may share your personal information outside of the Firm, and this may include with:

14. Third party agents/suppliers, or contractors (e.g. IT and communications service providers).
15. Third parties relevant to the product and services we provide (e.g. banks, law firms, accountants, developers).
16. To the extent required by law, regulation or court order (e.g. FCA, if we are under a duty to disclose your personal information in order to comply with any legal obligation).

We will only share personal information with a third party bound by obligations of confidentiality and in accordance with legal and regulatory requirements.

What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to process your personal information:

- 17. Consent** – we may (but usually do not) need your consent to use your personal information. You can withdraw your consent for some of our processing of special categories of personal data, such as your health or if you are a vulnerable individual, by contacting us.
- 18. Performance of a contract**– we rely on this legal basis if we need to process your personal data to fulfil our contractual obligations which you have requested from us (e.g. becoming a member of one of our programmes or delegate at an event or on a course), including steps we may need to take at your request before entering into a contract.
- 19. Legitimate interest**– we may use your personal information for our legitimate interests. Under legitimate interests we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests (e.g. use this information to share updates with you about our products and services, which we believe may be of interest to you; or because of our legitimate interests in the performance of activities that form part of the operation of our business).
- 20. Compliance with law or regulation**– we may use your personal information as necessary to comply with applicable law and/or regulation.

Your rights

Under GDPR, you have a number of legal rights in relation to the personal information that we hold about you, and you can request to exercise any of the rights by contacting us at gillie@gilliebarlow.com

Your rights are:

- 21. Right to be informed**– to be given information about how your data is being processed and why. (e.g. the information provided to you in this policy)
- 22. Right of access** – you have the right to access the personal data which we hold about you.
- 23. Right to rectification**– to have your personal information corrected if inaccurate or incomplete.
- 24. Right to erasure** – to have your personal data erased.
- 25. Right to object and to restrict processing of your personal data.**

26. Right to data portability – this allows you to obtain and reuse your personal data for your own purposes across different services (only applies to information you have provided to us).

27. Right to withdraw consent.

28. Right to lodge a complaint with the relevant data protection authority – if you think that any of your rights have been infringed by us, you can lodge a complaint with the ICO.

Please note that your rights may be limited and subject to restrictions in certain situations. However, you always have the right to object to processing for the purposes of direct marketing, regardless of the lawful basis that applies.

For complete information on your rights under the GDPR, you can visit www.ico.org.uk.

Security and data retention

When you give us personal information, we take steps to ensure that it is treated securely.

Non-sensitive details (e.g. your email address, etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us via the internet, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. We employ security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

How long will we hold your data for?

We will retain your information for the appropriate period of time to ensure that we can provide you with a continuous service, or as long as the legal or regulatory requirements require.

Marketing

When you register on the website or sign up to our newsletter, we will hold your data for a period of 6 years, with a review every 3 years. You will have the opportunity to opt out (unsubscribe) at any point should you wish to do so, as you have a right at any time to stop us from contacting you for marketing purposes. To opt out/unsubscribe, please click on “unsubscribe” link in any of our communications, or send your request to gillie@gilliebarlow.com

Contracted services

In line with regulatory and legal requirements, we will hold your data for 5 years from the end of the business relationship, in line with legal and regulatory requirements.

Changes to our privacy policy

We keep our privacy policy under regular review and will place any updates on this web page. We encourage you to check this policy every time you visit our website to be aware of any changes which may be relevant to you.

*This policy was last updated on **1 March 2021***