

PRIVACY POLICY

1. Notice

This is the Privacy Policy for Guide2. It describes who we are, how we obtain and use the personal data of representatives of our business customers, why we are allowed to do so by law, who has access to your personal data and what your rights are. Please review it carefully.

You have the right to object to us processing your personal data for our legitimate business interests or for direct marketing purposes (including any related profiling).

2. About us

We are Guide2 based within Herefordshire, UK. We take your privacy seriously and use your personal data as further explained in this Privacy Policy.

3. What personal data we collect and why

Personal data is any information which identifies you personally whether directly (for example, your name) or indirectly (for example, information about your use of our products and services). This Privacy Policy is concerned with the personal data of representatives of our business customers, including staff of companies, partners in a partnership and sole traders.

We collect the following personal data from you:

- Basic contact details: We collect your name, email address, postal address and telephone number so that we can contact you about your business listing on our directory and any other products and services that we have from time to time agreed to provide to your business;
- Business details: We require you to provide the name of the business you represent and details of the goods and/or services your business offers so that we can publish your business listing on our directory and provide you with the best possible service that is tailored to your business's needs. You may also choose to provide other information about you and your business. We do not require you to do this but if you do, we will process this other information for the purposes of publishing your business listing on our directory;
- Payment details: We require your payment details so that we can obtain payment for any paid-for products and services that we provide to your business; and
- Correspondence: We collect any additional personal data that you may provide to us from time to time if you contact us by email, letter or telephone, through our website or by any other means. If you contact us by telephone, we may also record the call and make notes in relation to your call for training and service improvement purposes, to comply with our legal obligations and to be able to deal with any dispute or defence of a claim which may arise in the course of us providing our products and services to you.

We also obtain information about you from other sources:

- **Cookies and similar technologies:** We track your use of our website through cookies and other similar technologies so that we can provide important features and functionality on our website, monitor its usage, and provide you with a more personalised experienced. Please see our Cookie Policy to find out more.

4. How we use your personal data

We use your personal data for the following purposes:

To publish your business listing on our directory and provide you with the products and services you have requested.

We use your personal data to accept you as a new or returning customer, publish your business listing on our directory and provide you with the products and services you have requested in accordance with their terms (which will differ depending on the particular products and services you have requested ([Terms and Conditions](#))).

To advertise the identity, address and contact details of your business on third party search engines, social media sites and other relevant business websites on your behalf.

If you have registered for this service, we share the identity, address and contact details of your business with third party search engines (such as Google), social media sites (such as Facebook) and other relevant business websites so that we can help promote your business to your target audience and drive potential customers to your own website.

To send you service communications, including in relation to changes to our contract terms.

We use the contact details you have provided to us so that we can communicate with you about the products and services that we provide to your business, including to let you know about major changes to those products and services or to the terms of the contract between us or to any related information (such as changes to this Privacy Policy).

To confirm your identity and verify the information you provide.

For security reasons and to safeguard the authenticity of our directory, we must confirm you are who you say you are. This means we may check the information you provide to us against other information we hold about you from the third party sources described above.

To process payments.

We process your payment details so that we can obtain payment for any paid-for products and services you have requested and collect any future payments or overdue amounts for those products and services.

Direct marketing (including by third parties)

If you have provided your consent or we otherwise have the right to do so, we may use your contact details to send you direct marketing and keep you informed of promotional offers by email, SMS, post or telephone relating to our products and services.

You can unsubscribe from our direct marketing at any time by clicking the “Unsubscribe” link in any of our emails or by contacting us.

Our trusted business partners would also like to use your name, email address, postal address and telephone number to inform you of similar products, services and promotional offers. We will only share your personal data with our partners where you have provided us with your consent to do so. You can unsubscribe at any time by clicking the “Unsubscribe” link in any of their emails or managing your preferences via their website.

To track your usage of our website, communications, products and services.

We use cookies and similar technologies to track your activity on our website so that we can provide important features and functionality on our website, monitor its usage, and provide you with a more personalised experienced. Please see our Cookie Policy to find out more.

We also use tracking technology within our emails to capture information such as the time and date you open our emails and the type of device used to open it. We use this information to understand the effectiveness of our email communications so that we can improve them in the future and provide a more personalised overall service to you.

To contact you about a contract renewal for paid-for products and services.

We use the contact details you have provided to us so that we can contact you to discuss the renewal of the contract between us for any paid-for products and services we provide. We will do this in the lead up to the expiry of your contract and, if we don't hear back from you to confirm whether or not you would like to renew your contract with us, up to six months after the date that your contract with us expires.

Please note that if we haven't heard from you by the time your contract for paid-for products and services expires or if you've told us your business no longer requires any of our paid-for products and services after your contract expires, your business will retain a free business listing on our directory. We will remove your listing if you tell us to by contacting us.

To provide and improve customer support.

We use your personal data to be able to provide and improve the customer support we provide to you (for example, where you have questions about our products and services).

To conduct internal training.

We may use your personal data for internal training purposes so that our staff members have the knowledge and expertise they need to ensure we provide you with

the best possible customer experience. For example, if you contact us by telephone, we may record the call and make notes in relation to your call for training and service improvement purposes.

To conduct market research and analytics.

We may analyse your personal data (potentially in combination with personal data relating to other customers) to better understand our customer base. We may also invite certain customers to be involved in market research. If you accept our invitation, we will use your feedback to improve our products and services.

To maintain our records and improve data accuracy.

Like any business, we process personal data in the course of maintaining and administering our internal records. This includes processing your personal data to ensure that the information we hold about you is kept up to date and accurate.

To respond to enquiries, complaints and disputes.

We use the personal data we hold about you to help us respond to any enquiries or complaints you have made, or deal with any dispute which may arise in the course of us providing our products and services to you, in the most effective manner.

To investigate, detect and prevent fraud and comply with our legal obligations.

In certain circumstances, we use your personal data only to the extent required in order to enable us to comply with our legal obligations, including for fraud detection, investigation and prevention purposes. This may require us to provide your personal data to law enforcement agencies, including Trading Standards, if they request it.

5. Legal grounds for processing

Data protection law requires us to only process your personal data if we satisfy one or more legal grounds. These are set out in data protection law and we rely on a number of different grounds for the processing we carry out. These are as follows:

Consent

In certain circumstances, we process your personal data after obtaining your consent to do so for the purposes of:

- sending you marketing communications about our products and services;
- sharing your name, email address, postal address and telephone number with our trusted business partners so that they may market to you about their own similar products and services;
- conducting marketing research.

Necessary for the performance of a contract and to comply with our legal obligations.

It is necessary for us to process your basic contact details, payment details and information about the business you represent for the performance of the contract between us (which, depending on the products and services we have from time to time agreed to provide to your business, is governed by one or more of the terms and conditions). In particular, we rely on this legal ground to:

- publish your business listing on our directory and provide you with the products and services you have requested, including where relevant, advertising the identity, location and contact details of your business on third party search engines, social media sites and other relevant business websites on your behalf and registering a domain name on your behalf;
- communicate with you about the products and services that we provide to your business, including to let you know about major changes to those products and services or to the terms of the contract between us or to any related information (such as changes to this Privacy Policy);
- confirm your identity and verify the information you provide;
- process payments; and
- provide and improve customer support.

If you choose not to give some or all of the aforementioned information to us, this may affect our ability to provide our products and services to you.

In certain circumstances, we also use your personal data only to the extent required in order to enable us to comply with our legal obligations, including to detect, investigate and prevent fraud.

Necessary for the purposes of our legitimate business interests or those of a third party.

It is sometimes necessary to collect and use your personal data for the purposes of our legitimate interests as a business, which are to:

- provide you with products and services that are as useful and beneficial to your business as possible, including by personalising our contact with you (using automated decision-making and profiling techniques) and making sure we tell you about all the offers that are relevant to your business;
- better understand our customer base so that we can improve our products and services and marketing activities (which could also benefit you);
- confirm whether or not you would like to renew your contract with us for any paid-for products and services;
- develop and improve our website to enhance the customer experience;
- train our staff so that we can provide you with a better customer service;
- respond to any enquiries or complaints you have made, or deal with any dispute which may arise in the course of us providing our products and services to you; and
- ensure effective operational management and internal administration of our business, document retention, compliance with regulatory guidance and exercise or defence of legal claims.

Please note that where we wish to rely on this legal ground for processing, we are required by data protection law to consider whether our legitimate interests are overridden by your interests or your fundamental rights and freedoms. We may continue to process your personal data on the basis of our legitimate interests only if we determine that your interests, rights and freedoms are not overridden by our legitimate interests.

We have considered these matters and on balance, we consider that the benefits described above are not outweighed by your interests or your fundamental rights and freedoms.

Where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected we will not process your personal data unless there is another legal ground for us to do so (either that we have obtained your consent to the processing or it is necessary for us to perform our contract with you or to comply with our legal obligations).

6. Who we share your personal data with and where it is stored by them.

We may provide your personal data to:

- our suppliers, companies who advertise on our website, and services providers, including other companies in our group, who perform certain business services for us and act as “processors” of your personal data on our behalf; and
- other organisations, who use your personal data for their own purposes and are “controllers” of such data in their own right. Such organisations may be located outside the EEA.

In addition, we may disclose your personal data:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to protect the rights, property or safety of our business, our customers or others. This includes, in specific cases, exchanging information with other organisations for the purposes of fraud protection; and
- to successors in title or replacement operators of all or part of our business.

7. How long we keep your personal data for.

We retain your personal data for no longer than is necessary for the purpose(s) for which it was provided. What this means in practice will vary between different types of data. When determining the relevant retention periods, we take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law;
- potential or actual disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your personal data from our systems when it is no longer needed.

8. Your rights.

You have the following rights regarding your personal data:

1. Right to be informed: You have the right to be provided with clear, transparent and easily understandable information about how we use your

personal data and your rights. This is why we are providing you with the information in this Privacy Policy.

2. Right of access: You have the right to obtain access to your personal data (if we are processing it) and certain other information (similar to that provided in this Privacy Policy). This is so you are aware and can check that we are using your personal data in accordance with data protection law.
3. Right to rectification: You are entitled to have your personal data corrected if it is inaccurate or incomplete.
4. Right to erasure: This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. Right to restrict processing: You have the right to 'block' or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further. We keep lists of people who have asked for further use of their personal data to be 'blocked' to make sure the restriction is respected in future.
6. Right to data portability: You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
7. Right to object to processing: You have the right to object to us processing your personal data for our legitimate business interests or for direct marketing purposes (including in each case any related profiling).
8. Right to withdraw consent to processing: If you have given your consent to us to process your personal data for a particular purpose (for example, direct marketing), you have the right to withdraw your consent at any time (although if you do so, it does not mean that any processing of your personal data up to that point is unlawful).
9. Right to make a complaint to the data protection authorities: You have the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how we have handled your personal data or believe our processing of your personal data does not comply with data protection law.

For more information about your rights or if you would like to exercise any of your rights, you are welcome to contact us.

9. Links to other websites

Our website contains hyperlinks to websites owned and operated by third parties. This Privacy Policy does not apply to those other websites. We encourage you to read the privacy statements on the other websites you visit, as they will govern the use of any personal data you provide when visiting those websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

10. Changes to this Privacy Policy.

This Privacy Policy was last updated on 19 June 2018.

This Privacy Policy may be updated from time to time so you may wish to check it each time you provide personal data to us. We won't alert you to minor changes, but if there are any major changes we will let you know and where appropriate ask for your consent.

11. Contact us

If you would like to exercise your data protection rights or if you are unhappy with how we have handled your personal data, you may contact us by:

Emailing our DPO: dpo@guide2.co.uk

If you're not satisfied with our response to any enquiry or complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) by:

Writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Telephone: 0303 123 1113

Submitting a message through the ICO's website at: ico.org.uk