



GUILLOCHE CONSULTANTS

Data Protection and Privacy Notice

This Data Protection and Privacy Notice ("Notice")

is issued by Guilloche Consultants Limited, an entity established in England and Wales ("GCL"), and applies to its direct or indirect subsidiaries, divisions and/or its branches ("Company/we").

Your privacy is important to us, and we are committed to protecting your personal data. Therefore, we respect and protect your right to privacy and will process your personal data in accordance with the provisions of the applicable privacy laws.

This Notice sets out what personal data we collect and how we collect and use it. It also sets out the rights you have in relation to the Personal Data.

What kind of personal data do we collect?

Personal data means any information relating to an identified or identifiable natural person. The Company collects and processes the following types of personal data:

- name, address, email address, telephone number and other contact information;
- date and place of birth;
- nationality;
- gender;
- employment details;
- marital status;
- copies of identity documents (such as passport, national ID card, driver's license, employee identification numbers);
- source of wealth;
- utility bills, bank statements;
- tax residency;
- details of shareholdings and other assets which are legally or beneficially owned by the data subject;
- details of people and organisations which may be connected to the data subject (by family or otherwise)

Please note that the list is not exhaustive and that the Company may also collect and process personal data to extent this is useful or necessary for the provision of our services.

How does the Company collect personal data?

Guilloche Consultants Limited
Registered in England and Wales

The Company obtains and processes personal data in different ways.

- Personal data provided to the Company directly: We collect personal data directly from (prospective) clients, business partners and intermediaries for the purposes of entering into a contract or a service agreement and/or to meet certain legal requirements.
- Personal data obtained from third parties :We also collect and process personal data from publicly accessible sources such as internet, social networks, World-Check or commercial registers. Furthermore, we may receive personal data from third parties as part of the service we provide to you or to people which are connected to you (including but not limited to organisations in which you have a shareholding or by which you are employed) or in connection with legal requirements that are applicable to us.

How does the Company use personal data?

The majority of the personal data processed by the Company is necessary for the performance of a contract to which the data subject is a party or to comply with the request of the data subject prior to entering into a contract. The Company also processes personal data in order to comply with our legal and regulatory obligations.

We may furthermore process personal data for the purposes of the legitimate business interests pursued by the Company. Such legitimate interests include general research and development (including statistical research or as a basis to analyze our current security measures), administration of our business and systems, including IT, billing and invoicing systems or to develop and improve our services or to strengthen our relationship with you. We may provide you with communications or information regarding our service offering which we think will be interesting for you. When we process your personal data for our legitimate business interests, or where consent to process personal data was received, we will consider and balance any potential impact on you and your rights under the relevant data protection and any other relevant law. Whenever we process personal data for these purposes you have the right to object to this way of processing.

To whom does the Company provide personal data?

The Company may disclose or transfer personal data collected by the Company to its group companies insofar as reasonably necessary for the purposes of our service offering or for bona fide compliance purposes as well as on the legal basis as set out in this Privacy Notice.

Except as described in this paragraph, the Company will not disclose, transfer or sell your personal data to any third party unless you have consented to this.

The Company may disclose or transfer personal data to subcontractors, intermediaries or external advisors for the purpose of the proper performance of the services we provide to our clients. It may, for example, disclose or transfer such personal data to third party service providers who provide administrative, computer, payment, data processing, debt collecting or other services. We enter into data processing agreements with such subcontractors to ensure that they process your data, on our behalf, with the same level of security and confidentiality

as applied by the Company. The Company may furthermore disclose or transfer personal data when we received your consent to do so.

In addition, the Company may disclose or transfer personal data to protect our rights or those of our clients and/or to prevent fraud. The Company can also be obliged to disclose or transfer personal data to competent authorities in order to comply with our legal and/or regulatory obligations.

International transfers and data storage

The Company may disclose or transfer personal data to other group companies that are located in countries that are outside the UK with the above purposes.

The personal data the Company processes is stored by the Company on our servers, and/ or on the servers of the cloud-based database management services the Company engages.

If disclosure or transfer of personal data is being done in a country that does not ensure an adequate level of protection of your personal data the Company will make sure additional safeguards will be put in place.

Retention

The Company will process and store the relevant personal data for the duration of our services or for the duration of the business relationship. The Company may also store the data for as long as it is necessary or required in order to fulfill legal, contractual or statutory obligations and, or for the establishment, exercise or defense of legal claims, and in general where it has a legitimate interest for doing so.

Your rights

You have the following rights:

- **Access to your information**

You have the right to access the personal information that the Company holds about you at any time.

- **Data portability**

You may ask the Company to provide you with a copy of the personal information that the Company holds about you.

- **Correction of your personal information**

You have the right to ask the Company to update and correct any out-of-date or incorrect personal information that we would hold about you.

- **Deletion of your personal information (the right to be forgotten)**

You have the right to ask the Company to delete your personal information, to the extent that the Company has no legal and/or regulatory obligations to keep such personal information.

- **Restriction of processing of your personal information**

You have the right to ask the Company to restrict the processing of your personal information in case:

- a. You contested the accuracy of the personal information held by the Company;
- b. The processing is unlawful but you objected to the deletion of the personal data and requests the restriction of the use instead;
- c. The Company no longer needs the personal data for the purposes of the processing, but you require them for legal reasons;
- d. You objected to processing and the Company is investigating whether there are legitimate grounds to override your objection.

- **Automatic decision making**

The Company generally does not make decisions by purely automatic means, but if we do, you have the right to object.

- **Object**

You have the right to object at any time to the processing of your personal data for any direct marketing (and related profiling) by the Company.

If you wish to exercise any of the above rights, you can contact the Company using the below contact details.

In addition you have the right to make a complaint with the local supervisory authority with respect to the way the Company is processing your personal data or the way the Company is handling your rights.

Navigation and Cookies

Please note that the Company is the controller of personal data collected through the Company's website (the "Website").

The Company collects personally-identifiable information on certain areas of the Website when users register, request publications or other information, sign up for conferences and events, apply for jobs, and participate in user posting areas, such as bulletin boards, discussion forums, and surveys. The personally-identifiable information collected may consist of information that you provide, such as names, mailing addresses, e-mail addresses, telephone and fax numbers, and, for recruiting purposes, any other personally-identifiable information on your resume.

The Website also uses cookies to identify you and your interests and to track usage of the
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website. Cookies are small pieces of text stored on your computer that help us know which browser you are using and where you have been on the Website and on websites to which you may link in order to use some of our features. By accepting our cookie, you will be permitted access to certain pages of the Website without having to log in each time you visit. A user who does not accept the cookie from the Website may not be able to access certain areas of the Website. The Company also logs IP addresses, or the location of computers on the Internet, to help diagnose problems with our server and to administer the Website. If you prefer not to accept a cookie, you can set your web browser to warn you before accepting cookies, or you can refuse all cookies by turning them off in your web browser.

How we protect personal data?

The Company is committed to ensuring the security of your personal data. The Company takes appropriate commercially reasonable technical, physical and organisational measures to prevent unauthorised or unlawful processing of your personal data or accidental loss or destruction of your personal data. The Company will ensure a level of security suitable to the identified risks and pursuant to applicable data protection laws.

Employees of the Company are trained to handle personal data securely and with utmost respect and they will treat your personal data strictly confidential. Staff members shall be authorized to access personal data only to the extent necessary to serve the applicable legitimate purposes for which the data are processed by the Company and to perform their job.

The Company will not divulge client information to a third party unless we have received explicit client authorisation or we are required to do so by law.

Changes to this notice

The Company may update this Notice from time to time. We advise you to periodically review this Notice to be informed of how the Company is protecting your privacy.

Contact

If you have any questions, concerns or complaints with respect to this Notice, the way the Company is handling your privacy or you wish to exercise any of your rights please contact guillocheconsultants@gmail.com



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