

Privacy Policy

General Data Protection Regulation (GDPR)

The General Data Protection Regulation or GDPR is a European Union regulation that is aimed at protecting personal data of EU citizens. It replaces the existing Data Protection Directive 95/46/EC and consolidates the data privacy laws across the EU region into one single regulation. The regulation comes into effect on May 25, 2018.

As per the new regulation, any company, be it EU or non-EU based, which processes personal data of EU individuals comes under the scope of GDPR.

Important terms in GDPR:

- **Personal data** - GDPR defines personal data as “Any information related to a natural person or ‘Data Subject’, that can be used to directly or indirectly identify the person. It can be anything from a name, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer IP address.”
- **Data processor and a data controller** - According to the GDPR, “A controller is the entity that determines the purposes, conditions and means of the processing of personal data, while the processor is an entity which processes personal data on behalf of the controller.”

1. Introduction

1.1	G H Group (we or us) is committed to protecting your personal information and respecting your privacy.
1.2	This Privacy Notice, together with any other documents referred to in it, sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us.
1.3	For the purpose of the General Data Protection Regulation [Regulation (EU) 2016/679], the data controller is G & H Associates Limited (company number 44467880), whose registered office is 122 Feering Hill, Feering, Colchester, Essex. CO5 9PY
1.4	We may update this Privacy Notice from time to time. Any changes we make in the future will be posted on our website at https://www.ghassociatesuk.com/privacy-policy/ . Please check back regularly to see any updates or changes to this Policy.

2. Data Protection Team

2.1	The contact details for our Data Protection Team are as follows:
2.1.1	data.gdpr@ghassociatesuk.com

GH Group

	2.1.2	+44 (0)1283 208848
	2.1.3	G & H Associates Limited, Suite 4 Enterprise Glade, Bath Yard, Moira, Swadlincote. DE12 6BA
2.2	It is the responsibility of the Data Protection Team to keep our organisation and our staff informed and advised about their obligations to comply with data protection laws, to monitor compliance with those laws, to train staff and conduct internal audits, and to be the first point of contact for supervisory authorities and for individuals whose personal data we are processing.	

3. Particulars of processing

3.1	We process personal data within the G H Group this includes GHA, GHB & JMR visitors to our website or events, and individuals and organisations with whom we work collaboratively in a range of ways, and for a range of purposes.	
3.2	The categories of person about whom we process personal data are described in more detail in the Particulars of Processing that are set out in the Schedules to this Privacy Notice.	
3.3	It may be the case that we have contact with you in more than one capacity, so please read this notice and then look at all the relevant schedules that may apply to you if you wish to know more about how we process your personal data, including the purposes and legal basis.	
	The specific Schedules are as follows:	
	3.3.1.	G & H Associates Limited - GHA [Schedule 1];
	3.3.2.	G & H Associates (Brussels) Limited - GHB [Schedule 2];
	3.3.3.	JMR International Limited - JMR [Schedule 3];

4. Your rights as a data subject

4.1	This Section 4 sets out the rights that you have as a data subject, by reason of the General Data Protection Regulation.	
4.2	The General Data Protection Regulation provides the following rights (subject to some exemptions):	
	4.2.1.	The right to request access to the personal data that we hold about you;
	4.2.2.	The right to request rectification of the personal data that we hold about you;
	4.2.3.	The right to request erasure of the personal data that we hold about you;

GH Group

	4.2.4.	The right to request restriction of processing about you;
	4.2.5.	The right to object to processing; and
	4.2.6.	The right to data portability.
	If you wish to exercise any of the above rights, please notify our Data Protection Team using the contact details set out in Section 2 above. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.	
	G H Group will generally process your personal data for contractual necessity in providing services or its legitimate interests. GH Groups will use personal information for additional relevant purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. The law calls this the “Legitimate Interests” condition for processing. Where we rely on it, the benefits being pursued are:	
	4.3.1.	To monitor, analyse and improve our services and websites, including enhancing and personalising your customer service
	4.3.2.	Complying with/supporting compliance with legal and regulatory requirements.
	4.3.3.	Internal training purposes.
	4.3.4.	To maintain our records and other administrative purposes, including updating your details and preferences.
4.3	4.3.5.	To assist with queries, complaints and dispute resolution; including transmission of email enquiries to clients, consortium partners, etc. coming via contact forms from GHA, GHB or JMR website portal.
	4.3.6.	Helping to prevent and detect crime such as fraud and money laundering.
	4.3.7.	To improve data accuracy and completeness - when you register for our services you may supply us with additional information about yourself which we will use to improve our data accuracy and completeness.
	4.3.8.	To ensure network and account security.
	4.3.9.	Email tracking – in order to improve our communications with you.
	4.3.11.	Upholding regulations to which relevant data subjects are under contract to adhere to and taking disciplinary action in cases where these are breached.
	4.3.12.	To monitor and record communications with you (such as telephone calls) for the purpose of quality assurance, training, fraud prevention and compliance
4.4	Where we ask for your consent this will usually be for marketing purposes by email. Where our processing of personal data is based on having given consent, you have the right as a data subject to withdraw that consent at any time. Please note that the withdrawal of your consent will not affect the lawfulness of any	

GH Group

	<p>processing based on that consent before its withdrawal.</p> <p>If you wish to invoke this right, please notify our Data Protection Department using the contact details set out in Section 2 above. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.</p>
4.5	<p>You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at https://ico.org.uk/global/contact-us/</p>

5. Retention of Data

5.1	<p>We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.</p>

6. Recipients of Data

6.1	<p>We use service providers to help us provide you with our services. Personal data may be transferred to these outsourced data processors, who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed. We only disclose your data to third parties for a limited number of reasons, these include: marketing, data management, technical support, project submission and evaluations.</p>
6.2	<p>Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.</p>
6.3	<p>These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and to not disclose your personal data to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.</p>
6.4	<p>In appropriate circumstances we may disclose data to authorised bodies as required by law.</p>

GH Group

7. Visitors to GHA, GHB & JMR websites

	We monitor how people use our websites. Our first party cookies set directly by our website collect data on:
7.1	<p>7.1.2. Google Analytics: to collect information about visitor behaviour on our websites. This analytics data is not tied to personally identifiable information. We do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.</p>
7.2	We collect these cookies as a legitimate interest in order to provide you with our online services and to analyse visitor behaviour on our websites.
7.3	Cookie information is held on your browser and you can amend your browser settings at any time. However, please be aware that blocking or deleting all cookies will affect the usability of our websites.
7.4	We may collect your Internet Protocol (“IP”) address, which is a number assigned to your computer when you connect to the Internet. As part of the protocol of the Internet, web servers can identify your computer by its IP address. In addition, web servers may be able to identify the type of browser you are using. G H Group collects IP addresses for the purposes of internal security, website analysis, and system administration, including to assess the traffic on the website, and to maintain and make improvements to the website. We do not link IP addresses to personal information, but we can and will use IP addresses to identify a user when we feel it is necessary to ensure compliance with this Privacy Notice or our Terms and Conditions, to protect the website, users, or other visitors, or to comply with applicable laws.

8. Contact details

8.1	You can contact us at the Data Protection Team details above if you have any questions or concerns about personal data and privacy matters.
8.2	Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.

GH Group

Schedule 1 – G & H Associates Limited – GHA

This Schedule sets out G H Group’s processing of personal data relating to GHA

What personal data do we process?

- Name
- Address
- Email address
- Telephone number
- CV Details
- Salary Details

Where do we obtain your personal data from?

Most of the above personal data is received direct from you as the data subject. However, information may be received from third parties.

Why do we process your personal data and what is the lawful basis?

We process your personal data for the following purposes:

<ul style="list-style-type: none"> • Administration and transactional communications relating to your grant project application. 	Contractual Necessity
<ul style="list-style-type: none"> • Provision of services relating to your grant project application. 	Contractual Necessity
<ul style="list-style-type: none"> • Contacting you by email to inform you of amendments to the new Grant Funding Call Areas and Grant Application Document. 	Contractual Necessity
<ul style="list-style-type: none"> • Submitting your grant application document to the applicable grant funding body. 	Contractual Necessity
<ul style="list-style-type: none"> • To carry out research relating your grant project application. 	Legitimate Interests

We also process personal data for G H Group’s legitimate interests as we have outlined in the main Privacy Notice (paragraph 4.3). Please be assured that we will always take account of your personal data rights in doing so.

GH Group

How long do we hold your personal data for?

Personal data will be retained for the duration of the development of the project application and beyond.

Are you obliged to provide us with your personal data?

The provision of this personal data is a necessary requirement for G H Group to deliver the services outlined within our consultancy agreement and the development of your funding application fully.

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform or provide GH Group services you have agreed to.

Recipients of your personal data

We disclose data to outsourced data processors, as agreed. (e.g. EU/Innovate – funding agencies)

Do we use your data for any automated decision-making?

No automated decision making is taken using your personal data.

Any financial data arising from a transactional process will be held securely by GHA Accounts Department in accordance and compliance with all statutory, HMRC and Financial Authority requirements.

GH Group

Schedule 2 - G & H Associates (Brussels) Limited - GHB

This Schedule sets out G H Group's processing of personal data relating to GHB

What personal data do we process?

- Name
- Address
- Email address
- Telephone number
- CV Details
- Passport
- Salary Details

Where do we obtain your personal data from?

Most of the above personal data is received direct from you as the data subject. However, information may be received from third parties.

Why do we process your personal data and what is the lawful basis?

We process your personal data for the following purposes:

<ul style="list-style-type: none"> • Administration and transactional communications relating to your European meetings with key decision makers and grant project application. 		Contractual Necessity
<ul style="list-style-type: none"> • Provision of services relating to your European meetings with key decision makers and grant project application. 		Contractual Necessity
<ul style="list-style-type: none"> • Contacting you by email to inform you of amendments to the European meetings with key decision makers, new Grant Funding Call Areas, Grant Application document updates and European Travel details and updates. 		Contractual Necessity
<ul style="list-style-type: none"> • To carry out research relating your grant project application and market sector developments/treads. 		Legitimate Interests

GH Group

We also process personal data for G H Group's legitimate interests as we have outlined in the main Privacy Notice (paragraph 4.3). Please be assured that we will always take account of your personal data rights in doing so.

How long do we hold your personal data for?

Personal data will be retained for the duration of the planning and development of the European meeting/s with key decision makers, development of the project application and beyond.

Are you obliged to provide us with your personal data?

The provision of this personal data is a necessary requirement for G H Group to deliver the services outlined within our consultancy agreement for the planning and development of the European Meeting/s with key decision makers and the development of your funding application fully.

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform or provide GH Group services you have agreed to.

Recipients of your personal data

We disclose data to outsourced data processors, as agreed. (e.g. European Key Decision Makers, EU/Innovate – funding agencies)

Do we use your data for any automated decision-making?

No automated decision making is taken using your personal data.

Any financial data arising from a transactional process will be held securely by GHB Accounts Department in accordance and compliance with all statutory, HMRC and Financial Authority requirements.

GH Group

Schedule 3 – JMR International Limited - JMR

This Schedule sets out G H Group’s processing of personal data relating to JMR

What personal data do we process?

- Name
- Address
- Email address
- Telephone number
- Salary Details

Where do we obtain your personal data from?

Most of the above personal data is received direct from you as the data subject/Funded Project Co-ordinator. However, information may be received from third parties.

Why do we process your personal data and what is the lawful basis?

We process your personal data for the following purposes:

<ul style="list-style-type: none"> • Administration and transactional communications relating to the general management of the project deliverables, financial reporting of your funded project. 	Contractual Necessity
<ul style="list-style-type: none"> • Provision of services relating to the financial management reporting of your funded project. 	Contractual Necessity
<ul style="list-style-type: none"> • Contacting you by email to inform you of updates to the Project deliverables, the financial management of your funded project and consortium meeting details. 	Contractual Necessity
<ul style="list-style-type: none"> • Submitting your grant application financial documents to the applicable grant funding body. 	Contractual Necessity

GH Group

We also process personal data for G H Group's legitimate interests as we have outlined in the main Privacy Notice (paragraph 4.3). Please be assured that we will always take account of your personal data rights in doing so.

How long do we hold your personal data for?

Personal data will be retained for the duration of the project management reporting and beyond for audit purposes.

Are you obliged to provide us with your personal data?

The provision of this personal data is a necessary requirement for G H Group to deliver the services outlined within our consultancy agreement for the financial reporting of your funded project to the relevant funding agency.

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform or provide GH Group services you have agreed to.

Recipients of your personal data

We disclose data to outsourced data processors, as agreed. (e.g. EU/Innovate - funders of the project)

Do we use your data for any automated decision-making?

No automated decision making is taken using your personal data.

Any financial data arising from a transactional process will be held securely by JMR Accounts Department in accordance and compliance with all statutory, HMRC and Financial Authority requirements.

GH Group