

GBS Procure Limited – Privacy Notice – March 2020

GBS Procure Limited are the ‘controllers’ of the information (‘personal data’) that we collect about you, our ‘data subjects’, which means we are responsible for how your data is processed. The word ‘process’ covers what can be done with personal data, including collection, storage, use, sharing and deletion. This privacy policy explains why and how we process your personal data, and explains the rights you have, including amongst others, the right to access your data, and to object to the way it is processed. Please see the section on ‘Your rights as a data subject’ for more details on your rights and how to exercise them.

GBS Procure is registered with the Information Commissioners Office (ICO) and our Reference number is: ZA687864. You can find guidance on our obligations under information rights legislation on the ICO’s website (www.ico.org.uk) as well as information on their regulatory powers and the action they can take.

Our contact details

Name: Gary Stephens
Role: Data Protection Officer
Phone Number: 07484 130029
E-mail: gary.stephens@gbsprocure.com
Website: www.gbsprocure.com

What type of information we have

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details)

How we get the information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have made an enquiry to us.
- You wish to attend, or have attended, an event.
- You subscribe to our e-newsletter.
- You have applied for a job, secondment or to be an associate with us.
- You are representing your organisation.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting gary.stephens@gbsprocure.com

(b) We have a contractual obligation.

(c) We have a legal obligation.

(d) We have a vital interest.

(e) We need it to perform a public task.

(f) We have a legitimate interest.

What we do with the information we have

GBS Procure processes your data so we can manage and support our relationship with you, comply with legal obligations, improve our services and achieve our legitimate business aims.

Processing Purpose	Legal basis for Processing
Website We collect information through this website, when you submit data through it, and through the use of Cookies.	This information is processed for our legitimate interests of responding to any enquiries you make through the website, and of understanding the effectiveness of our website.
Work contacts People we work with – organisations and companies – your contact details are personal data and we will treat it accordingly, using it only as part of our relationship with your organisation, whether we work in partnership or have a customer/supplier relationship.	This processing is based on our legitimate interests of managing business relationships appropriately.
Surveys and feedback In order to understand our customers' experiences and improve our services and products, we will contact you at various "touch-points" during our relationship with you, and ask you to complete a survey and give us feedback, over email or text or over the telephone. We may contract with specialist companies to carry out surveys on behalf of GBS Procure, which involves sending them your contact details and they gather your responses for us. You can opt out of this sort of contact if you prefer.	GBS Procure, and any specialist companies we work with, process data in order to ask for your feedback, based on our legitimate interests of improving our customer services and products.
Marketing	

We will send you information that we think will be useful or of interest to you, about the services we provide, whether they are paid for services or free of charge.

GBS Procure Ltd will send you hard copy marketing materials on the basis of our legitimate interests of increasing our customers' knowledge of other relevant services and products.

We will only send you emails or texts (electronic direct marketing) with this type of information if we have your consent to do so. For commercial services or products, this includes where you have bought, or entered into negotiations with us, for a similar service or product. Every time we send an email or text you will have the option to unsubscribe from similar marketing messages

Where we provide links to websites of other organisations (e.g. CIPS), this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

How we store your information

Your personal data is held securely in both hard copy and electronic formats.

Electronic data, including emails, is stored on our software suppliers' servers, which are located in the European Union.

GBS Procure retains information for legitimate business or for legal purposes and will not hold information for a period longer than is reasonably necessary to fulfil the purposes for which it was collected.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at gary.stephens@gbsprocure.com if you wish to make a request.

How to complain

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113