

Netguides Privacy Policy

The privacy and security of your personal information is extremely important to us.

This notice applies across all websites that we own and all services we provide, including our online booking websites and systems, and any other services we may offer for example, support or training. For the purpose of this notice, we'll just call them our 'services'. If you are a GemaPark or GemaActivity user, this notice applies to you too!

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number, bank account details, payment information, support queries and so on.

If you are a customer or potential customer of a company using a Netguides service, rather than a direct customer or potential customer of Netguides, we would refer you to the privacy policy of the company you are conversing with. While your data is processed by Netguides, it is done so with Netguides acting as a Data Processor for our customer under a GDPR compliant Data Processing agreement. Our customer will be the Data Controller and should be your first point of contact.

Who are 'we'?

When we refer to 'we' (or 'our' or 'us'), that means Netguides Limited. Our headquarters are in the UK. Our address and phone details are available on our 'Contact us' page of our website [Netguides.co.uk](https://www.netguides.co.uk).

Our commitment to you

The security of personal information is extremely important to us and we are committed to protecting and respecting your privacy. In this notice we aim to be clear about how we handle the information we collect from you or hold about you. We will detail how we collect, use and safeguard your personal information and any conditions under which we may need to share personal information.

We will also cover how information may be used for marketing and communication activities, your choices in this regard, your privacy rights and how the law protects you.

We'll never sell your personal data and will only share it with organisations we work with when it's necessary. The privacy and security of your data is assured. We will keep this Privacy Policy updated to show you all the things we do with your personal data.

What personal data do we collect?

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

Information you provide to us directly: When you visit or use some parts of our websites and/or services we might ask you to provide personal data to us. For example, we ask for your contact information when you sign up, respond to a job application, complete an enquiry form, contact us with questions or request support. If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services.

Information we collect automatically: We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best experience possible.

Some of this information is collected using cookies and similar tracking technologies.

Information we get from third parties: The majority of information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this

information to supplement the personal data we already hold about you, in order to better inform, personalise and improve our services, and to validate the personal data you provide.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services, and some functions and features on our websites may not be available to you.

Cookies and our Website

Cookies are small text files stored on your computer when you visit certain websites. We use first party cookies (cookies that we have set, that can only be read by our website) to personalise your online experience.

We also use third party cookies (cookies that are set by an organisation other than the owner of the website) for the purposes of website measurement as detailed below:

Third party cookies - Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, to allow us to evaluate and improve how the website is used. Google Analytics sets various cookies to collect standard internet log information and visitor behaviour information in an anonymous form. A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can, among other things, remember who you are. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google. This information is then used to evaluate visitor's use of the website and to compile statistical reports on website activity. Full information on how Google uses cookies can be found here: [Google Privacy Policy](#)

You can control the use of cookies inside your browser settings.

How we use your data

First and foremost, we use your personal data to operate our websites and provide you with any services you've requested, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

To communicate with you. This may include:

- providing you with information you've requested from us (like training or support materials) or information we are required to send to you
- operational communications, like changes to our websites and services, security updates, or assistance with using our websites and services
- marketing communications (about other products or services we think you might be interested in) in accordance with your marketing preferences
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

To support you: This may include assisting with the resolution of technical support issues or other issues relating to the websites or services, whether by email, via our support portal or otherwise.

To enhance our websites and services and develop new ones: For example, by tracking and monitoring your use of websites and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your user experience and provide you with more efficient tools.

To protect: So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly and in accordance with our terms of use.

To analyse, aggregate and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.

How we can share your data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure
- an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business
- other people where we have your consent.

International Data Transfers

When we share data, it may be transferred to, and processed in, countries other than the country you live in – such as to the United States. These countries may have laws different to what you're used to. Rest assured, where we disclose personal data to a third party in another country, we put safeguards in place to ensure your personal data remains protected.

For individuals in the European Economic Area (EEA), this means that your data may be transferred outside of the EEA. Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for EEA data (like New Zealand), or to a third party where we have approved transfer mechanisms in place to protect your personal data – i.e., by entering into the European Commission's Standard Contractual Clauses, or by ensuring the entity is Privacy Shield certified (for transfers to US-based third parties). For further information, please contact us using the details set out in the Contact us section below.

Security

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data.

We maintain physical, electrical and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable information.

We have taken technical and organisational measures to secure your data, including:

- All websites have a secure https:// address (URL). This means that a SSL certificate is in place so that if you submit any data via the website, then your information is encrypted whilst it is being transmitted to the applicable database or email server
- We limit access to your personal data to those who have a genuine business need to access it. Only employees who need the information to perform a specific job are provided with access to your data. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality. Contracts will be in place to protect any personal data.
- All our staff complete mandatory information security and data protection training on employment and annually thereafter to reinforce responsibility and requirements set out in our information security policies
- We implement appropriate measures and controls, including monitoring and physical measures, to the processing and storage of data
- We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so

- We require our third party vendors and providers to protect any personal information with which they are entrusted in accordance with our own policies and procedures

Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

Your rights

It's your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or send your request to privacy@netguides.co.uk.

You also have rights to:

- know what personal data we hold about you
- make sure it's correct and up to date and ask to amend it if it is not
- request a copy of your personal data in a commonly used machine-readable format
- ask us to restrict processing your personal data or delete it
- object to our continued processing of your personal data

You can exercise these rights at any time by sending an email to privacy@netguides.co.uk.

If you're not happy with how we are processing your personal data, please let us know by sending an email to privacy@netguides.co.uk. We will review and investigate your complaint, and try to get back to you within a reasonable time frame.

You can also complain to your local data protection authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>

Changes to this privacy notice

We'll amend this privacy notice from time to time to ensure it remains up to date and reflects why we collect and use your personal data. Please visit our website to keep up to date with any changes. The current version will always be posted on our website [Netguides.co.uk](https://netguides.co.uk)

Last updated: 01/10/2020

How to contact us

We're always keen to hear from you. If you're curious about what personal data we hold about you or you have a question or feedback for us on this notice, our websites or services, please get in touch.

As a technology company, we prefer to communicate with you by email – this ensures that you're put in contact with the right person, in the right location, and in accordance with any regulatory time frames.

Our email is privacy@netguides.co.uk