

DATA PRIVACY POLICY

Introduction

Go Climate Positive Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our [website terms of use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the UK GDPR, underpinned by the UK law the Data Protection Act (2018), and regulated by the UK ICO (Information Commissioners Office).

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The UK GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of UK GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The UK GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of UK GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Eoin McQuone is the data controller, this means the person who decides how your personal data is processed and for what purposes. Our contact details are: 21 Naunton Lane, Cheltenham, GL53 7BJ. For all data matters contact Eoin McQuone at eoin.mcquone@sustainablebd.com.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- I. To record contact details of people with whom we have a legitimate business interest for general, non-marketing communication, including to respond to messages sent to us.
- II. To inform customers and potential customers about our products/services and other relevant information about sustainable business.
- III. To analyse answers to online surveys in order to respond to the needs of our customers or potential customers.
- IV. To store financial data (eg. Bank account details) to enable processing payments to suppliers and payments from customers.
- V. To send quotations and invoices to customers who have purchased products/service and to send purchase orders and record payments to suppliers.
- VI. To send regular reminders to collect environmental data to customers who have asked us to.
- VII. To send discussion forum updates to contacts who have asked us to.
- VIII. To respond to contact requests when we have been asked to and have been given explicit permission to do so.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data
 - Personal profile/contact details including name, role, business name, email, website, address, telephone number(s) and social media page(s).
 - Marketing permissions
 - Financial data including bank account details
 - Transaction data including details of products/services purchased and payment made

We have obtained your personal data from information you shared with us in business cards, emails, online surveys, marketing opt-in forms, direct debit mandates, invoices and/or purchase orders.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of UK GDPR)

Our lawful basis for processing your general personal data:

<input checked="" type="checkbox"/> Consent of the data subject;	Relates to purposes II, VI, VII and VIII
<input checked="" type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Relates to purposes IV & V. Contracts for the purposes of purchasing goods and/or services.
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another person	
<input type="checkbox"/> Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
<input checked="" type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	Relates to Purpose I for maintaining general communications for non-marketing purposes and Purpose III for responding to the needs of our customers and potential customers.

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with employees and trusted sub-contractors of Go Climate Positive Limited when needed to perform tasks assigned to them. Your personal data will not be shared with any other third party unless you have explicitly asked us to and given permission for your data to be shared.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data.

- I. To record contact details of people with whom we have a legitimate business interest for general, non-marketing communication.
 - o Retained if there has been communication in the last 2 years.
- II. To inform customers and potential customers about our products/services and other relevant information about sustainable business.
 - o Retained until consent is withdrawn.
- III. To analyse answers to online surveys.
 - o Retained for up to 2 years in case of the need to respond to a query about the data.
- IV. To store financial data (eg. Bank account details) to enable processing payments to suppliers and payments from customers.
 - o Retained for up to 6 years after contract completion for tax purposes.
- V. To send quotations and invoices to customers who have purchased products/service and to send purchase orders and record payments to suppliers.
 - o Retained for up to 6 years after contract completion for tax purposes and in case of any legal claims/complaints.
- VI. To send regular reminders to collect environmental data to customers who have asked us to.
 - o Retained until consent is withdrawn.
- VII. To send discussion forum updates to contacts who have asked us to.
 - o Retained until consent is withdrawn.
- VIII. To respond to contact requests when we have been asked to and have been given explicit permission to do so.
 - o Retained for up to 6 months following the last communication

8. Providing us with your personal data

We require your personal data when it is necessary to respond to your request or to enter into a contract.

9. Your rights and your personal data

Unless subject to an exemption under the UK GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time (where consent is the legal basis for us processing the data);
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We use cloud storage from reputable suppliers that operate a high degree of security and privacy. These suppliers maintain multiple geographically separated data replicas and hosting environments to minimise the risk of data loss or outages.

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).

11. Automated Decision Making

We do not make decisions that have a legal (or similar effect) on you or anyone you introduce us to via automatic processing.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Eoin McQuone at eoin.mcquone@sustainablebd.com.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.