

PRIVACY NOTICE

1. INTRODUCTION

We, Gardin, take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and General Data Personal Regulation (GDPR).

This privacy notice aims to give you information on how Gardin collects and processes your personal data through your interaction with our websites under the domains of <https://www.gardin.co.uk>, <https://www.gardinagritech.com> or <https://www.gardin.ag> or by entering into a relationship with us, for the delivery of our services and to comply with our legal requirements.

2. WHO YOU ARE

The types of personal data we process, our purpose and the lawful basis for processing as well as how we make use of the data depends upon the relationship you have with us.

In the sections that follow we have outlined the type of personal data we collect and how we collect it, the purposes for which we process personal data and our lawful bases for our different relationships. Please select the relevant section for you from the list below, based on the relationship you have with us:

- A. [Website Visitors](#)
- B. [Marketing Recipients \(B2B Customers and Their Employees\)](#)
- C. [B2B Customers and Their Employees](#)
- D. [Suppliers or Staff/Representative of Suppliers](#)
- E. [Recruitment Candidates](#)

A) WEBSITE VISITORS

1. WHY WE COLLECT YOUR PERSONAL INFORMATION

- For operational purposes such as operating our website and ensuring it is presented in the most effective manner for you and for your computer or device
- Where you have consented to be contacted for such purposes, for marketing-related purposes including sending of our white paper or to provide you with information, resources or services that you request from us or which we feel may interest you
- For the purpose of researching and analysing the use of our websites and services
- For the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally
- For notifying you about the changes to our service

2. LAWFUL BASIS OF PROCESSING PERSONAL INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.

- If the processing is necessary for the performance of a contract.
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

The purpose test – to identify the legitimate interest

Necessity test – to consider if the processing is necessary for the purpose identified

Balancing test – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

3. WHAT INFORMATION DO WE COLLECT AND WHERE FROM?

We collect personal information from you, when you interact with our websites under the domains gardin.co.uk, gardinagritech.com or gardin.ag through utilisation of cookies and tracking technologies or when you enquire about any of our services and/or request a copy of any marketing materials (i.e. whitepapers or other technical documentation). The categories of personal information that we may collect, store and use about you include:

- Information about your activity on our site including information that you provide by filling in forms on our website, this includes information provided at the time of registering to use our site, subscribing to receive one of our white papers or requesting further services.
- Your details for sending out requested technical or marketing material via electronic mail or post.
- Records of your correspondence with us.
- System information related to your browsing session(s) on our website, such as browser type & version, operating system.

For more information please see [here](#).

B) MARKETING RECIPIENTS (B2B CUSTOMERS AND THEIR EMPLOYEES)

1. WHY WE COLLECT YOUR PERSONAL INFORMATION

- Where you have consented to be contacted for such purposes, for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes and lead generation
- To communicate with you about possible future collaborations and business opportunities

2. LAWFUL BASIS OF PROCESSING PERSONAL INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the purpose of the legitimate interest pursued by us.

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

The purpose test – to identify the legitimate interest

Necessity test – to consider if the processing is necessary for the purpose identified

Balancing test – considering the individual’s interests, rights or freedoms and whether these override the legitimate interests identified.

3. WHAT INFORMATION DO WE COLLECT AND WHERE FROM?

We collect your personal data when you sign up to our programs or events, through publicly available sources or referrals. We may collect and process the following information about you:

- Identification information such as name and surname
- Contact information such as email, telephone number, location
- Information available on your publicly available social media profiles, including your job title and company name

For more information please see [here](#).

C) B2B CUSTOMERS AND THEIR EMPLOYEES

1. WHY WE COLLECT YOUR PERSONAL INFORMATION

- For the purpose of looking for new prospects such as becoming partners in the future
- For the purpose of managing sales processes and signing of contracts
- For the purpose of managing our relationships and your accounts, communicating with you (excluding communicating for the purposes of direct marketing)
- For processing of invoices and purchase orders
- For arranging your sign-up to the Gardin Platform by creating your user account

2. LAWFUL BASIS OF PROCESSING PERSONAL INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- If the processing is necessary for compliance with a legal obligation to which the controller is subject.
- If the processing is necessary for the performance of a contract.
- If the processing is necessary for the purpose of the legitimate interest pursued by us.

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

The purpose test – to identify the legitimate interest

Necessity test – to consider if the processing is necessary for the purpose identified

Balancing test – considering the individual’s interests, rights or freedoms and whether these override the legitimate interests identified.

3. WHAT INFORMATION DO WE COLLECT AND WHERE FROM?

We collect your personal data when you enquire through our website, and throughout our relationship with you. We may collect and process the following information about you:

- Identification information such as name and surname
- Contact information such as email, telephone number
- Job title and company name and company address
- Bank details for expenses
- Your signature as apparent on the contract
- Information regarding your usage of our website and commercial product(s) that may be attributable to your unique user account for the purposes of security auditing and/or continuous improvement of our services.

For more information please see [here](#).

D) OUR SUPPLIERS AND THEIR EMPLOYEES

1. WHY WE COLLECT YOUR PERSONAL INFORMATION

- For the issuing and tracking and invoices and where we need to perform the contract we have entered with you such as by making payments.
- For the purpose of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing)

2. LAWFUL BASIS OF PROCESSING PERSONAL INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- If the processing is necessary for compliance with a legal obligation to which the controller is subject.
- If the processing is necessary for the performance of a contract.

3. WHAT INFORMATION DO WE COLLECT AND WHERE FROM?

We collect your personal data through publicly available sources or referrals initially and through our relationship with you. We may collect and process the following information about you:

- Identification information such as name and surname
- Contact information such as email, telephone number
- Job title, company address
- Bank details for expenses

For more information please see [here](#).

E) OUR EMPLOYEE CANDIDATES (RECRUITMENT)

1. WHY WE COLLECT YOUR PERSONAL INFORMATION

- For the purpose of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling.
- For the purpose of carrying out our recruitment process and determine eligibility for the advertised role.

2. LAWFUL BASIS OF PROCESSING PERSONAL INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- If the processing is necessary for the performance of a contract.
- If the processing is necessary for compliance with a legal obligation to which the controller is subject.

3. WHAT INFORMATION DO WE COLLECT AND WHERE FROM?

We collect your personal data through your application and through using recruitment agencies. We may collect and process the following information about you:

- Identification information such as name and surname including any other listed on the CVs such as nationality
- Information available on CV or cover letters
- Contact information such as email addresses, postal address & telephone numbers
- Education history such as establishments attended and qualifications.
- Employment history
- Information available on your publicly available social media profiles, including your job title and company name
- Contact information for submitted referees and the contents of the supplied references

For more information please see [here](#).

4. FOR HOW LONG DO WE KEEP INFORMATION

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will review your personal information regularly to establish whether we are still entitled to process it. If we decided that we are not entitled to do so, we will stop processing your personal information to the extent that it is appropriate to do so and securely delete or anonymise it. To determine the appropriate retention period, we will consider the amount, nature and sensitivity of that information, the potential risk of harm from unauthorised use or disclosure, and whether we can achieve the purposes for which we process that personal information through other means.

If you would like to find out for how long your information is being retained, please see "Additional Information", Section 10 of this policy.

5. SECURITY OF PERSONAL INFORMATION

Gardin takes the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We use computer safeguards such as firewalls and data encryption, we enforce access controls to our files, and authorise access to personal information only for those employees who require it to fulfil their job responsibilities.

We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

We have ensured that all employees have had information security and data protection training. If you would like more details of the security we have in place, please see "Additional Information", Section 10 of this policy.

6. YOUR INDIVIDUAL RIGHTS

In this Section 6, we have listed the rights that you have under data protection law.

Your principal rights under data protection law are:

- the right to access - you can ask for copies of your personal data; you or any third party acting on your behalf with your authority may request a copy of the personal data we hold about you without charge. We, Gardin will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you.
- the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data.
- the right to erasure - you can ask us to erase your personal data.
- the right to restrict processing - you can ask us to restrict the processing of your personal data.
- the right to object to processing - you can object to the processing of your personal data if, processing relies on legitimate interests, processing is for scientific or historical research, processing includes automated decision making and profiling, processing is for direct marketing purposes.
- the right to data portability - you can ask that we transfer your personal data to another organisation or to you.
- the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- rights relating to complaints and remedies.

These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

You ask any questions about these rights or exercise any of your rights in relation to your personal data by using the contact details set out under Section 10.

7. DATA TRANSFERS/THIRD PARTIES

7.1 TRANSFERS TO THIRD PARTIES

Gardin may disclose your personal data, listed under the relevant section to some third parties insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy. Third parties that we use are listed below:

- Business partners, suppliers, contractors for the performance of any contract we enter into with them or you
- Third parties that support us to provide products and services e.g. IT support, cloud-based software services, providers of telecommunications equipment) (e.g. Xero, AWS, Microsoft 365)
- Marketing and customer relationship management services providers (E.g. Hubspot)
- Banks for the purposes of making payments
- Professional advisors e.g. lawyers, auditors

If you want to find out in detail who your personal data is shared with, please see "Additional Information", Section 10 of this policy.

7.2 TRANSFERS OUTSIDE OF THE UK

We may share personal information to third parties outside of the United Kingdom. Likewise, the hosting facilities for our website and/or data centres may be located outside the United Kingdom. Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

If personal data is transferred outside of the UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

- Standard Contractual Clauses with the published ICO Addendum
- International Data Transfer Agreement
- An exception as defined in Article 49 of the GDPR

For more information about transfers and safeguarding measures, please contact us using the information in Section 10.

8. COOKIES

Our website uses cookies. Please see our Cookie Policy [here](#) for full details of the cookies used.

9. RIGHT TO COMPLAINT

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email on gdpr@gardin.co.uk.

Alternatively, you can make a complaint to the Information Commissioner's Office:

By Post:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By Website: [Click Here](#)

By Email: [Click Here](#)

By Phone: 0303 123 1113 (Local rate) or 01625 545 745 (National rate)

10. ADDITIONAL INFORMATION

Your trust is important to us. That is why we are always available to talk with you at any time and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this privacy policy or if you wish to receive more in-depth information about any topic within it, please contact us at gdpr@gardin.co.uk or call us on 01235 841505.

11. REVIEW OF THIS POLICY

We keep this Privacy Notice under regular review.

This Privacy Notice was last updated on 08/08/2024.

12. AMENDMENTS

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.