
PRIVACY NOTICE

BACKGROUND:

Ginger Promotions UK Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our brand ambassadors, staff and customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Ginger Promotions UK Ltd registered in England under company number 07945580
Registered address: Room 5 & 6, 31 Worship Street, EC2A 2DX, London

- Data Protection Lead: Christopher Thompson
- Email address: chris@gingerpromotions.life

2. What Does This Notice Cover?

This Privacy Information explains how We use your personal data, how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under Data Protection Legislation, you have the following rights, which We will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. Certain personal data may be used on an aggregated basis for the profiling of certain territories for the reason of territory management. The profiling that is conducted is done to assist in selecting and managing territories in which we operate. This enables us to allocate our resources in the most efficient manner for the purposes of targeting customer acquisition. We do not profile individual data subjects and data subjects are not subject to automated decision making. The envisaged consequences of such processing for the affected data subjects is minimal and will direct our customer acquisition business to territories depending on the results of the profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any ‘special category’ or ‘sensitive’ personal data.

Data Collected	How We Collect the Data
Identity Information including Name, Date of Birth, Address	Application Form, passport (or other ID), CV or by being signed up to a service or product via a Brand Ambassador.
Contact information including email address, telephone number	Application Form, CV or by being signed up to a service or product via a Brand Ambassador

Employment information including previous employment details.	Application Form, CV or by being signed up to a service or product via a Brand Ambassador
Payment information including Bank details.	Application Form, CV or by being signed up to a service or product via a Brand Ambassador
Marketing and Communications Data	Application Form, CV or by being signed up to a service or product via a Brand Ambassador
Technical Data including internet protocol (IP) address, your login data, browser type and version	Application Form, CV or by being signed up to a service or product via a Brand Ambassador

6. How Do You Use My Personal Data?

Under Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how We will use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business.	Payment Information Identity Information Contact Information Employment Information	We will process all of your data under Contract

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including Name, Date of Birth, Address,	Brand Ambassadors information will be deleted 2 weeks after last payment is made. Employee information will be kept for 7 years after you have left employment.
Contact information including email address, telephone number	Brand Ambassadors information will be deleted 2 weeks after last payment is made. Employee information will be kept for 7 years after you have left employment.
Employment information including previous employment details.	Brand Ambassadors information will be deleted 2 weeks after last payment is made. Employee information will be kept for 7 years after you have left employment.
Payment information including Bank details.	Brand Ambassadors information will be deleted 2 weeks after last payment is made. Employee information will be kept for 7 years after you have left employment.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the UK and the European Economic Area (EEA). This means that it will be fully protected under Data Protection Legislation.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

9. Do You Share My Personal Data?

We will not share any of your personal data with any other third parties for any purposes, subject to the following exception[s].

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Recipient	Activity Carried Out	Sector	Location
Bookkeeper	Making payments	n/a	UK and EEA
Accountant	Payroll	n/a	UK and EEA
Acwyre	ID Badges & Vetting	n/a	UK and EEA
Clients	ID Badges & Vetting	n/a	UK and EEA

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data We have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of our progress.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

- Data Protection Lead: Christopher Thompson
- Email address: privacy@gingerpromotions.life

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change our business in a way that affects personal data protection.

Any changes will be made available on our website. This Privacy Notice was last updated on 25th May 2018.