

## Introduction

### PRIVACY POLICY

This is GS Verde Group Limited's privacy policy.

GS Verde Group Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), or use any of our services and tell you about your privacy rights and how the law protects you.

#### 1. IMPORTANT INFORMATION AND WHO WE ARE

##### Privacy policy

This privacy policy gives you information about how GS Verde Group Limited collects and uses your personal data through your use of this website, including any data you may provide when you contact us, download any information, sign up to our newsletter, or use any of our services.

This website is not intended for children and we do not knowingly collect data relating to children.

##### Controller

GS Verde Group Limited is the controller and responsible for your personal data (collectively referred to as "GS Verde Group", "we", "us" or "our" in this privacy policy). The GS Verde Group is made up of different entities, details of which can be found here:

<https://www.gsverde.group/>. Please see each entity's privacy policy for further information on how they will process your personal data when you purchase their services or contact them directly.

We will let you know which entity will be the controller for your data when you purchase any of our services (which would be set out in our engagement letters).

GS Verde Group Limited is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the information set out in the contact details below.

#### IMPORTANT INFORMATION

The "GS Verde Group" is the trading name of a number of legal entities, all or a combination of which are engaged by you (as set out above) for the provision of "the Services". Each one of the companies providing the Services trading as GS Verde Group is severally liable and individually responsible for its specific portion of the Services as set out in the Services section of this letter. Each company has its own set of terms and conditions, a copy of which has been provided to you as part of the engagement pack. These terms are also available on request from [hello@gsverde.group](mailto:hello@gsverde.group). Please note that GS Verde Group Limited is not engaged in the provision of any services – it is a non-trading, holding company for the subsidiaries within the GS Verde Group. No claims made against GS Verde Group Limited will be valid. Any complaints or claims should be directed to the relevant company (or companies) listed above to whom the complaint relates.

All of the GS Verde Group companies are limited companies, registered in England and Wales with their registered office address at The Maltings, East Tyndall Street, Cardiff, CF24 5EA - apart from GS Verde Tax and Accountants whose address is at One The Square, Bristol, BS1 6DG.

- GS Verde Law Ltd, company number 8259989, VAT number 153 8487 81,
- GS Verde Corporate Ltd, company number 11120252, VAT registration number 286622084;
- GS Verde Tax and Accountants Ltd, company number 07107090, VAT registration number 982296871.

## 2. CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

- Full name of legal entity: GS Verde Group Limited
- Name of DPO: Lorna Jacques
- Email address: [ljacques@gsverde.law](mailto:ljacques@gsverde.law)
- Postal address: GS Verde, The Maltings, East Tyndall Street, Cardiff, United Kingdom, CF24 5EZ Telephone number: 0330 107 8498

## Complaints

If you have concerns about how we process your personal data, you have the right to make a data protection complaint against us directly. Details of how to do so are set out below:

Please address such complaints to our Operations Manager, Danielle Calo, at [dcalo@gsverde.group](mailto:dcalo@gsverde.group) or by post to GS Verde, The Maltings, East Tyndall Street, Cardiff, United Kingdom, CF24 5EZ. We will acknowledge your complaint within 7 days and we aim to respond fully within 56 days.

If you are not satisfied with our response, you also have the right to complain to the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection, at [www.ico.org.uk](http://www.ico.org.uk) or by telephone on 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 3. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth, gender and gender identity.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes the services requested / engaged for by you, your interests, preferences, feedback and survey responses.

- **Usage Data** includes information about how you interact with and use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and any of our Group disciplines , receiving newsletters from us, your communication preferences and how you interact with our marketing materials.

We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users searching our website for a specific service in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

If we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you when you visit or use our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We will collect and process Special Categories of Personal Data when you use any of our services, in order with our requirements to confirm your identity to satisfy money laundering requirements. The relevant GS Verde Group entity will collect biometric data in this instance, processed by our third party identification software.

#### 4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services;
  - subscribe to our publications / newsletters;
  - request marketing to be sent to you;
  - complete a survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Cookies are kept on our log for 180 days.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, including but not limited to:
  - Technical Data from Google analytics;

- Identity and Contact Data from:
  - data brokers or aggregators (such as Inform Direct or Zoom Info),
  - publicly available sources such as Companies House and the Electoral Register based inside the UK
  - any of our Group entities if they have had communication with you (as set out in each entities group policy).
- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services such as GoCardless or Stripe.

## 5. HOW WE USE YOUR PERSONAL DATA

### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure client experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** Generally we do not rely on consent as a legal basis for processing your personal data. We rely on consent only in limited circumstances for example are a GS Verde Law client and you agree for your data to be shared with the entities in GS Verde Group) If we do rely on consent then we have obtained your active agreement to use your personal data for a specified purpose.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis [and retention period]
To register you as a new contact or client	(a) Identity (b) Contact	Performance of a contract with you
To deliver services including:	(a) Identity (b) Contact	(a) Performance of a contract with you

(a) Manage payments, fees and charges (b) Collect and recover money owed to us	(c) Financial (d) Transaction (e) Marketing and Communications	(b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries (c) Asking you to leave a review of complete a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and measure or understand the effectiveness of the publications we send out.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, client relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about GSV Group services that may be of interest to you, or may be required as complementary services to the services you are engaged for.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our Group services and grow our business)

	(f) Marketing and Communications	
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### **Direct marketing**

You will receive marketing communications from us if you have requested information from us or used services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which services may be of interest to you so that we can then send you relevant marketing communications.

### **Third-party marketing**

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes. We only intend to share your data with our Group companies for marketing purposes, and no external third parties, unless you have requested an introduction to one of our contacts.

### **Opting out of marketing**

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us at any time.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or client service purposes.

### **Cookies**

For more information about the cookies we use and how to change your cookie preferences, please see our cookie policy.

## **6. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data where necessary with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- Internal Third Parties.
  - Entities within the GS Verde Group (subject to consent if you are a law client)
- External Third Parties such as:
  - Service providers acting as processors based in the UK who provide IT and system administration services.
  - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK or internationally (dependant on the services) who provide consultancy, banking, legal, insurance and accounting services.
  - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

- Software providers such as HubSpot, Action Step, Smart Search, Inform Direct used across the group acting as processors to support us in the provision of our services.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the UK or Ireland.

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement.

## **8. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. DATA RETENTION**

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use

or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for seven (7) years after they cease being clients (6 years for tax purposes, 1 additional year for our compliance check purposes).

If you have made contact with us to enquire about our services, but not purchased any services from our Group, we shall destroy any personal data held every twenty four months since our last contact with you, unless you otherwise provide your consent for us to continue to process such data, or engage with marketing or promotional materials in a positive way.

In some circumstances you can ask us to delete your data. See below for further details.

If you make contact with us in respect of seeking employment, your data shall be processed in accordance with our candidate privacy policy.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **10. YOUR LEGAL RIGHTS**

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see OPTING OUT OF MARKETING in paragraph 5 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us (details above).

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **11. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our privacy policy under regular review. This version was last updated in July 2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

## **12. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.