

Privacy Notice

We are committed to safeguarding the privacy and this policy sets out how we will treat your personal data.

Our contact details

Gungho Marketing Ltd can be found at Stowey House, Bridport Road, Dorchester, DT1 3SB, United Kingdom

You can contact our voluntarily appointed Data Protection Officer at DPO@gunghomarketing.co.uk if you have any concerns or wish to exercise your rights.

If you are an EU Data Subject you can contact our EU Representative, Rune Peterson, at eurep@fifthsquare.eu. Our EU Representative complies with our obligations under GDPR Article 27 and is established in the Republic of Ireland. Please note that our EU Representative is a Third Party. They will process your personal data in accordance with this Privacy Notice.

In a Nutshell

Our activities involve the processing of personally identifiable data. We have implemented strong data privacy and security safeguards to lower your risk. In summary:

- We only collect data about you that is relevant and necessary.
- Your data will only be held on systems that meet our high standards.
- Your data will only be accessed by those who need it, and we will minimise the amount of data that is processed, wherever possible.
- We won't sell your data to any third party
- We will only share your data with carefully chosen processors that meet or exceed our own standards or where you have responded/engaged with marketing we have carried out on behalf of our clients.
- We will always remember that it is your personal data, not ours. As such we will ensure complete transparency and openness with you wherever possible and give you as much control as we can.

What data we collect

We currently collect and process the following Personal Data:

- Name
- Job Title
- Telephone Contact Details
- Email Address
- Employer Company Name
- Location of Employer Company
- Social Media Identifiers in some cases
- Information you give us – for example when you request information, enter a contract with us or communicate with us.

When you visit our website we may also capture details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

If you would like to uphold your rights then please contact our Data Protection Officer at the contact email address above.

If you are in dissatisfied with our response you also have the right to lodge a complaint with the Data Protection Authority. This can be done at <https://ico.org.uk/concerns/>

What do we do with your data?

We use your data to market to you either directly or on behalf of our clients, fulfil contractual arrangements or for agreed purposes.

Every marketing communication allows you to opt out of receiving emails & phone calls for that campaign, except for the purposes of fulfilling any contractual obligation. You can also contact us at the email address above and request to uphold your rights. If you request for your data to be deleted, your name and email address will be added to an exceptions list and all other data removed.

How we obtain your data and why we process it

The data we process is obtained from several sources. These include yourself, our clients, data providers and online resources in the public domain. We use data to carry out direct B2B and B2C marketing and sales and research.

In some cases, we will process data about you as part of a contract with your employee. If you provide us personal data as a third party, you confirm that you have the right to do so either through consent or another legal basis.

Legal Basis for Processing

The lawful basis we use for most B2B processing is "Legitimate Interest". The ICO recommend that companies using this basis conduct a "Legitimate Interests Assessment" (LIA) and we have done this. For B2C marketing we rely on consent mechanisms.

Who is data shared with?

Personal data is never shared with any third party other than the client we are working on behalf of. We never resell or share this data to any other party other than in the circumstances where we are legally required by law to disclose your personal information or to further fraud protection and reduce the risk of fraud.

We use several third parties for software and services. For example, most of our data is stored on Microsoft 365 and Salesforce and we use an IT company to help support our infrastructure. We also use Mailchimp and DotDigital for some marketing activities. We regularly review suppliers for data security compliance to ensure your data is safe and track where your data is held.

As such, data will either be in the UK, EEA or US data centres. We may also process your data in countries outside the UK or European Union from time to time in other aspects of our business.

We use the following safeguards with respect to data transferred outside the UK and European Union:

- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union, specifically that in the country of the United Kingdom;
- We comply with a code of conduct approved by the United Kingdom supervisory authority and where adequacy decisions are in operation;
- We carry out best endeavours where cloud providers do not allow individual contracts or Standard Contractual Clauses (for example Microsoft) and duly note the guidance issued by Schrems II

Our website and other materials sent to you may contain links to other third-party websites. We may also offer buttons to social media that link to third party services. We're not responsible for the content or your data privacy these sites provide through their tools or sites.

Calls to or from us may be recorded for information holding, quality and training purposes.

If you would like to know about the processors and sub processors we use or have any other concerns about the way we use your data please email us at the address above.

Legal Compliance

We are committed to the secure and compliant handling of all data held and processed by the company including our obligations under the Data Protection Act 2018, PECR, UK GDPR and EU GDPR. This Privacy Notice was last modified on 24th February 2022.

For all marketing by phone we uphold regulations by OFCOM and abide by the TPS and CTPS lists on at least a quarterly basis.

Our Data Protection Authority is designated as the Information Commissioners Office.

Due to our global reach, we do not warrant compliance with all legal obligations in countries that we operate in outside of the UK.