

Data Protection and Privacy Policy

Incorporating our Data Protection Complaints Policy

1. Overview

Global 4 Communications Ltd (Global 4, we, us, our) is committed to protecting your privacy and keeping your personal information secure. This policy explains what personal information we collect, how and why we use it, who we share it with, how long we keep it, and the rights you have. It also explains how to make a complaint about the way we handle your personal data.

We comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025, the Privacy and Electronic Communications Regulations 2003 (PECR), and any other applicable data protection laws. To prevent unauthorised access or disclosure, we maintain appropriate physical, technical and organisational measures to safeguard the information we hold.

2. Who we are

Global 4 Communications Ltd is the data controller for the personal information described in this policy. Our registered office is Global House, 60b Queen Street, Horsham, West Sussex, RH13 5AD, company number 03526932. We are registered with the Information Commissioner's Office under registration number Z2482818. We have appointed a Data Protection Officer, who can be contacted using the details in the Contact us section below.

3. The data protection principles

We follow the principles set out in the UK GDPR. These require that personal information is:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes and not used in any manner incompatible with those purposes
- adequate, relevant and limited to what is necessary
- accurate and, where necessary, kept up to date
- kept in a form which identifies you for no longer than is necessary
- processed in a way that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage

We are also accountable for our compliance with these principles and must be able to demonstrate it.

4. Information we collect

To operate effectively and meet our legal obligations, we collect and use personal information about current, past and prospective customers, suppliers, website users and other individuals with whom we deal. Depending on your relationship with us, this may include your name and contact details, account and contract records, your correspondence and communications with us, your marketing preferences, and technical and usage data such as your IP address, device and browsing information. Such information may be held on computer, on paper or on other media, and is always obtained and handled lawfully.

Tel: 01403 272 910

Website: www.global4.co.uk

Email: sales@global4.co.uk

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5. How we use your information and our lawful bases

We use your personal information to provide and manage our services and contracts, to respond to your enquiries and provide support, to keep a record of our communications so we can resolve any issues, to tell you about our services and any changes or improvements, to carry out marketing where we are permitted to do so, to carry out research and improve our services, to prevent fraud, and to comply with our legal obligations.

We may monitor, record and store telephone, email and other electronic communications with you for training and quality purposes, so that we can check instructions given to us and improve our customer service.

We rely on one or more of the following lawful bases, depending on the activity: performance of a contract with you; compliance with a legal obligation; your consent, for example for certain marketing and cookies; and our legitimate interests, for example managing and improving our business, preventing fraud and direct marketing, balanced against your interests and rights. Where we rely on legitimate interests we carry out an assessment, and where we rely on consent you may withdraw it at any time.

6. Cookies and similar technologies

Our website and online services use cookies and similar technologies. We use strictly necessary cookies without consent. For other cookies, such as those used for advertising, we ask for your consent, which you can manage or withdraw through our cookie banner or your browser settings. Following changes made by the Data (Use and Access) Act 2025, we may use certain low risk cookies, such as analytics used to improve our service, without consent, while still giving you clear information and a way to object.

We use information collected from cookies to understand matters such as your connection speed, operating system, the time and duration of your visit and your IP address, to improve your experience and the quality of our services, to save your preferences, and to show you tailored features or advertising.

7. Marketing and your choices

Where we send you marketing by electronic means, we do so in accordance with PECR and the UK GDPR. You can opt out of marketing at any time by using the unsubscribe option in our messages or by contacting us. Opting out of marketing does not affect any processing we carry out on other lawful bases.

8. Profiling and automated decisions

We may build a profile of your interests and preferences in order to make our communications more relevant to you. You can object at any time to profiling for direct marketing. If we ever make a decision that produces legal or similarly significant effects for you based solely on automated processing, we will tell you and apply the safeguards required by law, including your right to obtain human intervention and to contest the decision.

9. Protecting your information

We employ technical and organisational security measures appropriate to the nature of the data, including any special category data. Only authorised employees are given access to personal data, under binding confidentiality and data protection obligations, and any breach of those obligations is treated as a disciplinary matter. While we work hard to secure our website and online services, no transmission of information over the internet can be guaranteed to be completely secure, and any such transmission is at your own risk.

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10. Children

We do not knowingly collect personal information about children. Children should obtain the consent of a parent or guardian before providing any personal information or using our services.

11. Information we share

We may share your personal information with carefully selected third party service providers and partners who process it on our behalf under written contracts that meet the requirements of data protection law, and with third parties where required or permitted by law, including law enforcement authorities investigating a suspected criminal offence.

Where we share your personal information with Time Vendor Finance Limited, it will be shared by them with fraud prevention agencies, who use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services or finance by Time Vendor Finance Limited. Further details of how your information is used by Time Vendor Finance and these fraud prevention agencies, and your data protection rights, are available on request. We do not sell your personal information.

12. Third party processors

We periodically appoint digital marketing agents and other processors to carry out activity on our behalf, under contracts that require them to protect your information. They currently include:

- **Prospect Global Ltd (trading as Sopro)**, UK company number 09648733, registered with the ICO under reference ZA346877. Privacy information is available at sopro.io and their Data Protection Officer can be contacted at dpo@sopro.io.
- **Scale Shore Consulting**, UK company number 14627466, scaleshore.com. Their data protection officer can be contacted at joshua.asubiojo@scaleshoreconsulting.co.uk.
- **FastField (Quickbase)**, UK company number 12122844, who can be contacted at fastfieldsupport@mergemobile.com.
- **Fellow Insights, Inc.** Registered address: 275-532 Montreal Road, Ottawa, ON, K1K 4R4. Data protection officer contact details: privacy@fellow.app

13. International transfers

Where we transfer personal information to a country outside the United Kingdom, we ensure that an appropriate safeguard is in place, such as UK adequacy regulations or the International Data Transfer Agreement, so that your information continues to receive a level of protection consistent with UK data protection law and our ISO 27001:2022 certification.

14. How long we keep your information

We retain your personal information in accordance with our retention schedule and to comply with our legal, regulatory and financial obligations. The right to have your data erased is not an absolute right, and we may need to retain information where it forms part of a statutory or legal obligation or an existing contract.

15. Your responsibilities

Please tell us as soon as possible if any of the personal information you have provided to us changes.

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16. Your rights

Depending on the lawful basis for processing, you have the following rights. In most cases these rights are not absolute:

- to be informed about how we use your personal data
- to request a copy of the personal data we hold about you, known as a subject access request
- to have inaccurate personal data corrected
- to have your personal data erased in certain circumstances
- to restrict our processing in certain circumstances
- to data portability in certain circumstances
- to object to processing, including profiling, for direct marketing
- to rights in relation to automated decision making
- to withdraw your consent where we rely on it

There may be compelling or overriding legal reasons why we cannot meet a request in full, in which case we will explain why. To exercise any of these rights, please contact us using the details in the Contact us section below.

17. Complaints and subject access requests

If you are unhappy with how we have handled your personal data or a rights request, you can complain to us directly. This reflects the statutory right introduced by the Data (Use and Access) Act 2025, in force from 19 June 2026. Making a complaint to us is free of charge and does not affect your right to complain to the regulator or to seek a remedy through the courts.

You can complain by email to privacy@global4.co.uk or by writing to the Data Protection Officer at the address in the Contact us section below. Please include, where you can, your name and contact details, what your complaint is about, the personal data or interaction involved, and the outcome you are seeking. We can still consider your complaint if you cannot provide all of this. If you need help to complain, or a particular format or adjustment to assist you, please tell us.

How we handle your complaint:

- We will acknowledge your complaint within 30 days of receiving it
- We may ask you for information to confirm your identity, requesting only what is proportionate
- The Data Protection Officer, or someone acting under their direction, will investigate
- We will respond without undue delay, aiming to provide a full response within one month of acknowledgement, and if the matter is complex, we will tell you why we need longer and give you a revised timescale
- We will explain the outcome and how to take the matter further if you remain dissatisfied

Subject access request procedure

You have the right to ask for a copy of the personal data we hold about you, together with related information. This is known as a Subject Access Request. You can make a request in writing or verbally, but we would prefer that you make it in writing to privacy@global4.co.uk, or by post to the Data Protection Officer at the address in the Contact us section below, as this helps us deal with it promptly.

You do not need to use a particular form.

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To help us respond, please tell us:

- Your full name and contact details
- Any account, customer or reference number you have with us
- The personal data or records you are looking for, and any relevant dates
- The format in which you would like to receive the information

We will ask you for information to confirm your identity, so that we do not disclose your personal data to the wrong person. The one-month period for responding does not begin until we have verified your identity and, where your request is unclear or wide ranging, received any reasonable clarification we have asked you for.

We will respond within one month, as per the GDPR regulations. However, we may extend this by up to two further months where a request is complex or where we receive a number of requests from you. We will evaluate your request within the first month if we need to do so. We carry out a reasonable and proportionate search for the information you have requested, as per the guidelines.

We will provide a copy of your personal data, together with information about how and why we process it, who we share it with, how long we keep it, the source of the data where relevant, and your rights. We will provide the information securely, and electronically where you have made your request electronically, unless you ask otherwise.

A subject access request is usually free of charge. We may charge a reasonable fee, or refuse to act, where a request is manifestly unfounded or excessive, and we will explain our reasons. Where the information includes personal data about other people, or is subject to an exemption under data protection law, we may redact or withhold that part and will tell you where we have done so.

If you are unhappy with how we have handled your subject access request, you can complain to us using the complaints process above, and ultimately to the Information Commissioner.

If you remain dissatisfied, you have the right to complain to the data protection regulator. We ask that you raise your complaint with us first and the regulator may expect you to have done so. The Information Commissioner's Office, which is being reconstituted as the Information Commission, can be contacted as follows:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113

Website: ico.org.uk

You also have the right to apply to the courts for a remedy.

18. Contact us

To exercise your rights, to make a complaint, or for any question about this policy, please contact:

Data Protection Officer

Global 4 Communications Ltd

Global House, 60b Queen Street, Horsham, West Sussex, RH13 5AD

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19. Changes to this policy

We may update this policy from time to time. The current version, together with its version number and date, is shown at the top of this document and is available on our website. This policy is owned and reviewed at least annually by the Data Protection Officer, and sooner if there is a relevant change in law, regulation or regulatory guidance.