



PRIVACY POLICY

The UK ceased to be a contracting party to the EEA after its withdrawal from the EU on 31 January 2020. Gusto takes the protection of your personal information very seriously and we have controls in place to ensure that the information you entrust to us will be held securely and processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

Gusto (“we” “our” or “us”) processes personal data of a number of different categories of individuals where we are the Data Controller. This information is provided to individuals whose data we process (“you” or “your”) to comply with our obligations under the data protection regulations.

This policy sets out the information you need to know to understand how we will process and protect your information.

Below we shall refer to the ‘Data Subject’, this is the individual whose personal information we hold; they could be our employees, prospective employees, clients, beneficiaries, attorneys, suppliers or other identifiable individual.

Who are we?

The Data Controllers are Gusto Group, which comprises of Gusto Construction, Gusto Homes, Gusto Ventures depending on the service we are providing. The initial documentation we send to you will make clear which company you are engaging with. Our full contact details can be found at the end of this policy.

Why do we need your information?

We need your personal information to allow us to offer our services to you and to comply with our legal and fiduciary duties. Personal information may be collected and processed for the following purposes:

- to provide goods and services to you
- to tailor the web content to you
- to verify identity
- to enable us to manage you customer experience
- for crime and fraud prevention
- for marketing purposes
- for administration reasons
- for training (employee related)
- for the purpose of employment (employees only)

We may disclose the above information to our service providers, agents or other trusted third parties for these purposes.

What information do we capture?

Gusto Group collects information through face-to-face meetings, completing fact-finds and other relevant forms and documentation relating to the services we are providing. We also capture information through our websites. We will only collect relevant information necessary to allow us to



provide our service to you or discharge our legal responsibilities. The information we collect will include but is not limited to:

- personal information including name and contact details, such as address, email and telephone number
- We may ask about medical conditions in order that we can tailor services to your needs, and in the event of an emergency may pass this to the emergency services
- Financial information such as bank details and wealth management information as well as bank statements for anti-money laundering and regulatory requirements.

This list is not exhaustive and other relevant information may be captured as part of our relationship.

Children

We do not actively market to children, and we never knowingly ask a child to reveal personal information.

Employees & Job Applicants

We will collect all personal information required to comply with employment legislation and if relevant, to make reasonable adjustments at the recruitment stage. This information may include where necessary sensitive “special category” data. This may include medical information and where appropriate we will perform a criminal record search. To prevent discrimination, and ensure diversity we will request information from the Data Subject on religion, sexuality and ethnicity in order to comply with our regulatory requirements. Please refer to the HR Data Protection Policy for full details and the Data retention schedule.

CCTV

In order to prevent and detect crime, and to ensure the safety of our clients and staff, we operate CCTV systems at various locations. These cameras record footage in real-time and are operated and controlled by our own staff, who have had suitable training of the operation and control of the system and information which it captures. Monitoring and recording does not take place in any personal areas and any recordings are kept securely and only accessed by authorised members of staff. Please refer to the Gusto Group CCTV Policy for further information.

Cookies

Anonymous user data is recorded when visiting our website, please see the section on cookies and Google Analytics below. No data is shared with any third parties.

How we process your information

We will only use your personal information for the purpose for which it was given, we will not keep it for longer than is necessary and will destroy the information securely according to our Data Retention Schedule.

In order to process your personal data obtained on the website and financial transactions we use trusted and authorised secure third party websites. Personal or sensitive “special category” information is not held on the website or shared by third parties including any outside of the UK.

Where we store your information

Your personal information will be hosted securely within the UK. If we transfer your information to a data processor, for example, an email broadcast company to assist us in keeping you up-to-



date with announcements, news and information, and they are located outside of the EEA, we shall take all reasonable steps to ensure that your information is protected as if we hosted it ourselves.

International Transfers

We will not transfer personal data relating to you to a country which is outside the UK or European Economic Area unless:

- a) The country or recipient is covered by an adequacy decision;
- b) Appropriate safeguards have been put in place which meet the requirements of the UK GDPR by us or by our client (on whose behalf we would transfer the data); or
- c) One of the derogations for specific situations under the UK GDPR is applicable to the transfer. These include (in summary):
- d) The transfer is necessary to perform, or to form, a contract to which we are a party: with you; or a third party where the contract is in your interests;
- e) The transfer is necessary for the establishment, exercise or defence of legal claims;
- f) You have provided your explicit consent to the transfer; or
- g) The transfer is of a limited nature, and is necessary for the purpose of our compelling legitimate interests.

Who we share your information with

Your information may be shared within the Gusto Group of companies. We will only do this with your permission.

We may need to share your information with trusted third parties and professionals such as (but not limited to) estate agents, service providers linked to purchases and insurers. This will only be done to fulfil the contract for which we are providing services to you.

We will never share or sell your personal information to any other third party. We will only share your personal information with another third party where we are required to do so by court order or law. For example, we may be required to pass details or images from CCTV to the police to investigate a crime.

If we are the subject of a merger or takeover then your personal information will be passed to the new entity, but it will only be used for the same or similar purpose you gave it for. Similarly, if the name of our legal entities change you will be informed of the change and given the opportunity to withdraw consent.

Marketing consents and permissions

We may wish to keep you informed of our activities, events and relevant sector updates, but will only do so with your express permission. When you engage with Gusto you will be invited to opt-in to receiving information by your preferred marketing channel, this includes email, Post, text message (SMS) and telephone.

You have a right to change, amend or withdraw your consent to receive direct marketing messages at any time. You can ask us to update or correct your personal information or 'opt out' of our marketing mailing list at any time by contacting us:



- Post: Marketing Manager, Gusto Group Ltd, Millenium Green Business Park, Rio Drive Collingham, Newark, Notts. NG23 7NB
- By email: mail@gusto-uk.com

Your information will be used in accordance with UK Data Protections law and we have robust systems and controls in place to keep your information safe.

Cookie Policy

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

We do not store any personal data in the cookies that we use and store your information anonymously to assist us in the running of the site, and also for monitoring the activity and traffic both to and through our website.

Depending on the browser you use you should be able to control what cookies are placed on your device through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Google Analytics

We use Google Analytics to analyse the use of our websites; Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' devices. The information generated relating to our website is used to create reports about the use of our website. Details captured during your visit will include, but not limited to, traffic data, location data, weblogs and other communication data and the resources you access, however, all data collected is anonymous and will not identify you as an individual.

Google, store this activity information, and you can view Google's privacy policy at <http://www.google.com/privacypolicy.html>.

To opt out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>

Your rights as the data subject

You have certain rights under existing data protection laws and these are listed below for your convenience:

- You have the right to have a copy of the information which we hold on you. Unless there is a legitimate reason why you cannot make the application in writing, your request should be addressed in writing by letter or email, to the Managing Director at the company address above
- You have a right to object to processing that is likely to cause, or is causing you damage or distress.
- You have a right to prevent processing for direct marketing; simply email or call us as described above and we will stop sending marketing materials to you.
- You have a right to object to decisions being taken by automated means; although I can confirm we make no decisions on you using an automated process.
- You have the right to rectification: the right to have your personal information rectified if it is inaccurate or incomplete



- You have the right to erasure/"right to be forgotten": where the processing of your information is based on your consent, the right to withdraw that consent and the right to request that we delete or erase your personal information from our systems (however, this will not apply if we do not rely on your consent to carry out the processing or if we are required to hold on to the information for compliance with any legal obligation or if we require the information to establish or defend any legal claim);
- You have the right to restriction of use of your information: the right to stop us from using your personal information or limit the way in which we can use it;
- You have the right to data portability: the right to request that we return any information you have provided in a structured, commonly used and machine-readable format, or that we send it directly to another company, where technically feasible
- You have a right to claim compensation for damages caused by a breach of the Data Protection Act.

ICO registration details:

- **Organisation name:** Gusto Group Limited **Reference:** ZA342789

Complaints

If you are unhappy with how we have processed your personal information, please firstly contact Gusto directly. Further information for lodging complaints is available on the ICO website.