

PRIVACY POLICY

BACKGROUND:

Garrison Technology Limited (“We” or “Us”, and “Our” shall be construed accordingly) 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 everyone 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.

Please read this Privacy Policy (“this Policy”) carefully and ensure that you understand it.

1 Information About Us

- 1.1 Garrison Technology Limited is the controller responsible for your personal data. We collect and process your personal data when you fill in a form at an event (such as, trade show, webinar and networking event) or when you fill in a webform on Our Site.
- 1.2 Our website, www.garrison.com (“Our Site”) is owned and operated by Garrison Technology Limited, a limited company registered in England under 09286531, whose registered address is 117 Waterloo Road, London, SE1 8UL.
- 1.3 Our Website Privacy Policy contains more detailed information about Our data processing (including about data security, data retention and lawful processing bases) and you should read that in conjunction with this Policy. See <https://www.garrison.com/privacy-policy/>
- 1.4 Our Data Protection Officer can be contacted by email at dpo@garrison.com.

2 What Is Personal Data?

- 2.1 Personal data is defined by the Retained Regulation (EU) 2016/679 (‘UK GDPR’) and the Data Protection Act 2018 (“Data Protection Legislations”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.
- 2.2 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.

3 What Are My Rights?

- 3.1 Under the 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.
 - b) The right to access the personal data We hold about you.
 - c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete.
 - 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.
 - 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.
- 3.2 Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- 3.3 More information about Our use of your personal data or exercising your rights as outlined above can be found here <https://www.garrison.com/privacy-policy/>.

4 What Data Do You Collect and How?

- 4.1 We may collect, use, store and transfer different kinds of personal data about you as follows:
 - a) Identity Data;
 - b) Contact Data;
 - c) Technical Data;

- d) Interaction Data;
- e) Marketing and Communications Data.

4.2 We use different methods to collect data about you, which are explained below:

Data Collected	How We Collect the Data
Basic personal & business information (for example, name, organisation, job) and contact information (for example, email address and phone numbers)	Via a form at an event (such as, trade show, webinar and networking event) or via a webform on Our Site.
Technical information including e.g., IP address, browser type and version, operating system.	Via Google Analytics and HubSpot.
Interaction data (for example, email opens, clicks, and other engagement metrics)	Via HubSpot.

5 How Do You Use My Personal Data?

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

What We May Do	What Data We Use	Our Lawful Basis
Communicating with you.	Basic personal & business information, and Contact information provided by you when filling webforms on Our Site.	Through Our web forms you express a desire for contact, or further information. We will use your data to respond to you.
Analysing website and email engagement.	Technical information and interaction data.	Our legitimate interest to improve Our services and understand user engagement.
Marketing purposes, which may include contacting you by email and/or telephone with information, news, and offers on Our products and/or services.	Basic personal and business information, contact information, and interaction data.	Your consent, which you can withdraw at any time.

6 How Long Will You Keep My Personal Data?

- 6.1 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
Basic personal & business information (for example, name, organisation, job) and Contact information (for example, email address and phone numbers) you provide to Us via Our webforms and events.	For up to 18 months or until they are clearly out of date or there is no current business or no potential for future business with the customer, whichever is earlier.
Technical information including e.g. IP address, browser type and version, operating system.	Information collected via Google Analytics and HubSpot will be retained for a maximum period of 14 months.
Interaction data (for example, email opens, clicks, and other engagement metrics) collected via HubSpot.	For up to 18 months or until they are clearly out of date or there is no current business or no potential for future business with the customer, whichever is earlier.

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

- 7.1 We may store or transfer some or all of your personal data in countries outside the UK. These are known as “third countries” and may not have data protection laws that are as strong as those in the UK. This means that We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:
- 7.2 We share your data within the group of companies of which We are a part, some of which are outside the UK.
- 7.3 We may share your data with external third parties, that are based outside of the UK.
- 7.4 More information on how and where We store or transfer your personal data can be found here <https://www.garrison.com/privacy-policy/>.

8 Do You Share My Personal Data?

- 8.1 We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:
- 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.
 - 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.

9 How Do I Contact You?

- 9.1 To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please send an email to dpo@garrison.com.