
PRIVACY POLICY

Introduction

Global Trade Credit Alliance Ltd understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, gtca.co ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 11, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to our third-party data processor via Our Site. This definition shall, where applicable, incorporate the definitions provided in the General Data Protection Regulation ("GDPR").
"We/Us/Our"	means Global Trade Credit Alliance, a limited company registered in England under company number 04265787, whose registered address is Allen House, The Maltings, Station Road, Sawbridgeworth, Herts, CM21 9JX.
"They"	Means Credit & Business Finance, a limited company registered in England under company number 04000171, whose registered address is Allen House, The Maltings, Station Road, Sawbridgeworth, Herts CM21 9JX

2. Information About us

2.1 This section tells you about us

2.1.1 Our Site is owned and operated by Global Trade Credit Alliance, a limited company registered in England under company number

04265787, whose registered address is Allen House, The Maltings, Station Road, Sawbridgeworth, Herts, CM21 9JX.

The Data Compliance Officer of our third-party data processor is Hannah Haslam, who can be contacted by email at privacy@cxfb.co.uk, by telephone on +44 1279 722555, or by post at Global Trade Credit Alliance Ltd, Allen House, The Maltings, Station Road, Sawbridgeworth, Herts, CM21 9JX.

- 2.1.2 The ICO regulates data protection in the UK and you can find out more about your rights here <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

3. **What Does This Policy Cover?**

This Privacy Policy applies to your use of Our Site and our third-party data processor we use. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. **Your Rights**

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- 4.1.1 The right to be informed about the collection and use of personal data;
- 4.1.2 The right of access to the personal data our third-party processor holds about you (see section 10);
- 4.1.3 The right to rectification if any personal data our third-party processor holds about you is inaccurate or incomplete (please contact CBF Ltd using the details in section 13);
- 4.1.4 The right to be forgotten – i.e. the right to ask our third-party processor to delete any personal data they hold about you (they only hold your personal data for a limited time, as explained in section 6 but if you would like them to delete it sooner, please contact them using the details in section 13);
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 4.1.7 The right to object to our third-party using your personal data for particular purposes; and
- 4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about CBF Ltd's use of your personal data, please contact them using the details provided in section 13 and they will do their best to solve the problem for you. If they are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. **What Data Do We Collect?**

Depending upon your use of Our Site, the following personal and non-personal data may be collected by CBF Ltd who are the third-party supplier to Global Trade Credit Alliance (please also see Our Cookie Policy in section 11 below on Our use of Cookies and similar technologies):

- 5.1 name;
- 5.2 business/company name
- 5.3 contact information such as email addresses, postal address and telephone numbers;
- 5.4 financial information such as company turnover;

6. **How Do We Use Your Data?**

- 6.1 GTCA does not process any personal data. CBF Ltd processes the above data on behalf of GTCA.
- 6.2 All personal data is processed and stored securely with CBF Ltd, for no longer than is necessary in light of the reason(s) for which it was first collected. CBF Ltd will comply with their obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.3 Credit & Business Finance Ltd's use of your personal data will always have a lawful basis, either because it is necessary for CBF Ltd's performance of a contract or agreement with you, because you have consented to their use of your personal data (e.g. by subscribing to emails), or because it is in their legitimate interests. Specifically, They may use your data for the following purposes:
 - 6.3.1 Providing and managing your Account;
 - 6.3.2 Supplying Our services to you (please note that They require your personal data in order to enter into a contract or agreement with you);
 - 6.3.3 Replying to emails from you;
- 6.4 You have the right to withdraw your consent to CBF Ltd using your personal data at any time, and to request that they delete it.
- 6.5 CBF Ltd do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
 - 6.5.1 If you stop being a customer of CBF Ltd we may keep your data for up to 10 years for the following reasons:
 - 6.5.1.1 To respond to a question, claim or complaint or to show we acted fairly and reasonably
 - 6.5.1.2 To study client data as part of their own internal research
 - 6.5.1.3 To follow rules that apply to them about keeping records
 - 6.5.1.4 They may also keep your data for longer than 10 years if they cannot delete it for legal, regulatory or technical reasons.

7. How and Where Do We Store Your Data?

- 7.1 GTCA does not keep any personal data. CBF Ltd, as a third-party processor, keeps your data for as long as they need to in order to use it as described above in section 6, and/or for as long as they have your permission to keep it.
- 7.2 Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).

8. Do We Share Your Data?

- 8.1 We contract with third party supplier and data processor, Credit & Business Finance Ltd (CBF Ltd), services to you as described in section 6. In this case, CBF Ltd may require access to some or all of your data. Where any of your data is required for such a purpose, CBF Ltd will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law. You can see CBF Ltd’s Privacy Policy at cbfb.co.uk.

9. How Can You Control Your Data?

- 9.1 If you have questions about, or need further information concerning the legal basis on which CBF Ltd collect and use your personal information, please enquire to the Data Compliance Officer using the contact details provided under the “contacting us” heading below, or visit cbfb.co.uk for a copy of their Privacy Policy.

10. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by CBF Ltd (where such data is held). Under the GDPR, no fee is payable and CBF Ltd will provide any and all information in response to your request free of charge without delay, and within one month of receipt of the request. Please contact CBF Ltd for more details at privacy@cbfb.co.uk, or using the contact details below in section 13.

11. Cookie Policy and Our Use of Cookies

- 11.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 11.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 11.3 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 11.4 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings, but please be aware that Our Site

may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

11.5 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
PHP Session	Standard sessions	Yes
quform_session	Contact form information	Yes

11.6 Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

11.7 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.

11.8 The analytics service(s) used by Our Site use(s) the following Cookies:

_ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat	1 minute	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named <code>_dc_gtm_<property-id></code> .

__utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing <code>__utma</code> cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	10 minutes	Used to throttle request rate.
__utmb	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing <code>__utmb</code> cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmc	End of browser session	Not used in <code>ga.js</code> . Set for interoperability with <code>urchin.js</code> . Historically, this cookie operated in conjunction with

		the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmv	2 years from set/update	Used to store visitor-level custom variable data. This cookie is created when a developer uses the <code>_setCustomVar</code> method with a visitor level custom variable. This cookie was also used for the deprecated <code>_setVar</code> method. The cookie is updated every time data is sent to Google Analytics.

- 11.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 11.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 11.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

12. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last amended on 18th May 2018.

13. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at privacy@cbfb.co.uk, by telephone on +44 1279 722555, or by post at Global Trade Credit Alliance Ltd, Allen House, The Maltings, Station Road, Sawbridgeworth, Herts, CM21 9JX.