

# GATHR TO FIND PRIVACY POLICY

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## 1. WELCOME

- 1.1 Gathr Tech Ltd ("**Gathr**", "**we**", "**us**" or "**our**") operates a platform, which it makes available through its website at [www.gathrtofind.com](http://www.gathrtofind.com) (the "**Website**") which enables "**Service Providers**" to list and promote their services, and prospective users of such Service Providers' services ("**Users**") to view Service Providers' profiles and connect with them (the "**Gathr Service**").
- 1.2 This privacy policy sets out how we collect, store, transfer, share and use information that identifies or is associated with you (your "**personal information**") when you access and use our Website, use the Gathr Service or contact us about our products and services.
- 1.3 Please read this privacy policy carefully. If you have any questions about this privacy policy or how we use your personal information, please contact us using the contact details set out in paragraph 3 below.

## 2. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION

- 2.1 Gathr will be the controller of your personal information when you use the Website, contact us about the Gathr Service, contact us to list a Service Provider on the Gathr Service or leave a review about a Service Provider on the Gathr Service. This means that, in those circumstances, we determine and are responsible for how your personal information is used as set out in this privacy policy.
- 2.2 For some uses of personal information collected through the Gathr Service we act as a processor on behalf of the relevant Service Provider, meaning that the Service Provider, and not us, is a controller of that personal information and is responsible for how it is used. This applies where a Service Provider has featured your details on their profile on the Gathr Service, or if you are a User and contact a Service Provider through the Gathr Service. Please refer to the relevant Service Provider's privacy policy to understand how they will use your personal information.

## 3. HOW TO CONTACT US

If you would like to contact us, you can email us at [privacy@gathrtofind.com](mailto:privacy@gathrtofind.com).

## 4. INFORMATION WE COLLECT AND HOW WE USE IT

- 4.1 When we collect your personal data, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we will not be able to respond to your request or, where applicable, provide you with access to the Gathr Service.
- 4.2 **When you contact us about our products and services**

When you contact us by email, chatbot, phone or through the "contact us" form on the Website, we will collect the following information:

Personal information	How we use it	Legal basis we rely on
<b>Your contact details</b> , such as your full name and email address.	We use this information to communicate with you, including responding to your questions and comments and, where you have asked us to do so, providing you with more information about the Gathr Service.	The processing is necessary for our legitimate interests, namely communicating with prospective Service Providers and Users.
	If you sign up to our newsletter, we will use this information to send you emails with information and news about Gathr.	The processing is necessary for our legitimate interests, namely promoting the Gathr Service.
<b>Your comments and questions</b> that you provide to us in any messages or communications you send to us.	We use this information to respond to your questions and comments and provide you with relevant information about the Gathr Service at your request.	The processing is necessary for our legitimate interests, namely communicating with prospective Service Providers and Users.

#### 4.3 When you create a User account on the Gathr Service

If you are a User and create an account on the Gathr Service (a "**User Account**"), we will collect the following information about you:

Personal information	How we use it	Legal basis we rely on
<b>Your account details</b> , such as your full name, email address, LinkedIn account name, the name, location, type and sector of organisation you work for, and the stage of development of that organisation.	We use this information to set up and authenticate your User Account and grant you access to the Gathr Service.	If you are an individual User, the processing is necessary for the performance of a contract with you, namely our <a href="#">User Terms of Service</a> .  If you are the main point of contact for a User organisation, the processing is necessary for our legitimate interests, namely administering our relationship with the User.
	We use this information to tailor how the Gathr Service is displayed to you, such as ordering search results and Service Providers based on	The processing is necessary for our legitimate interests, namely tailoring the Gathr Service to the User.

	information about the organisation you work for.	
	We use this information to send you service-related communications in relation to your User Account and the Gathr Service.	<p>If you are an individual User, the processing is necessary for the performance of a contract with you, namely our <a href="#">User Terms of Service</a>.</p> <p>If you are the main point of contact for a User organisation, the processing is necessary for our legitimate interests, namely administering our relationship with the User.</p>

#### 4.4 When you contact us to list a Service Provider on the Gathr Service

When you contact us to list a Service Provider on the Gathr Service, we will collect the following information about you:

Personal information	How we use it	Legal basis we rely on
<b>Your contact details</b> , such as your full name, email address and information you provide about the Service Provider you are listing.	We use this information to communicate with you about your listing or recommendation on the Gathr Service.	<p>If you are an individual Service Provider, the processing is necessary for the performance of a contract with you, namely our <a href="#">Service Provider Terms of Service</a>.</p> <p>If you are the main point of contact for a Service Provider, the processing is necessary for our legitimate interests, namely administering our relationship with the Service Provider.</p>
We will collect information contained in any <b>support requests</b> that you submit to us in respect of the Gathr Service.	We use this information to identify errors in, and improvements we can make to, the Gathr Service.	The processing is necessary for our legitimate interests, namely informing our product development and improvement.

4.5 If you are a sole trader listed as a Service Provider on the Gathr Service, we will also collect and use the following information about you and your services:

Personal information	How we use it	Legal basis we rely on
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<b>Information about the services you offer</b> as a Service Provider and your experience.	We use this information to list you as a Service Provider on the Gathr Service.	The processing is necessary for the performance of a contract with you, namely our <a href="#">Service Provider Terms of Service</a> ..
Information about the <b>Users that have received services or purchased any products from you</b> and how much you have charged them.	We use this information to calculate any transaction fees owed to us.	The processing is necessary for the performance of a contract with you, namely our <a href="#">Service Provider Terms of Service</a> ..
<b>Amounts invoiced and owed to us</b> and that you have paid to us in respect of any subscription or transaction fees.	We use this information to submit invoices and collect amounts owed to us.	The processing is necessary for the performance of a contract with you, namely our <a href="#">Service Provider Terms of Service</a> ..
	We use this information to maintain transaction records for accounting and tax reporting purposes.	The processing is necessary to comply with a legal obligation to which we are subject.
<b>Overall review rating</b> in relation to your services, as calculated by us based on the reviews you receive from Users.	We use this information to provide the User review functionality of the Gathr Service.	The processing is necessary for the performance of a contract with you, namely our <a href="#">Service Provider Terms of Service</a> ..
We will collect information contained in any <b>support requests</b> that you submit to us in respect of the Gathr Service.	We use this information to respond to your support requests.	The processing is necessary for the performance of a contract with you, namely our <a href="#">Service Provider Terms of Service</a> ..

#### 4.6 When you submit a review about a Service Provider

If you submit a review about a Service Provider to the Gathr Service, we will collect and use the following information about you:

<b>Personal information</b>	<b>How we use it</b>	<b>Legal basis we rely on</b>
<b>Your contact details</b> , such as your full name, email address, information about the organisation you work for and your role within that organisation.	We use this information to contact you about your review.	The processing is necessary for the performance of a contract with you, namely our <a href="#">User Terms of Service</a> ..
	We use this information to display the origin of any	The processing is necessary for our legitimate

	reviews posted on the Gathr Service.	interests, namely ensuring the integrity of the reviews posted to the Gathr Service.
<b>The services received from the Service Provider, feedback, star rating and any other content contained in your review.</b>	We will display the content of your review on the Gathr Service.	The processing is necessary for the performance of a contract with you.
	We use this information to assess whether the review complies with Gathr's Review Guidelines and, where required, remove any non-compliant reviews.	The processing is necessary for our legitimate interests, namely ensuring the integrity of the reviews posted to the Gathr Service and their compliance with our Review Guidelines.

#### 4.7 When you search for and contact a Service Provider on the Website

When you search for and contact Service Providers using the search and filter functionalities on the Gathr Service, we will collect and use the following information about you:

<b>Personal information</b>	<b>How we use it</b>	<b>Legal basis we rely on</b>
<b>The search parameters you enter</b> , including information about the type of company on whose behalf you are conducting the search, the services you require and the location and size of Service Provider you are looking for.	We use this information to display an automatically generated list of Service Providers in accordance with your preferences and search parameters.	The processing is necessary for the performance of a contract with you.
	We use this information to generate aggregated statistics about how the Gathr Service is used, such as information about interest in and searches for specific types of Service Provider. We use this aggregated information to report to Service Providers and inform how we can improve the Gathr Service.	The processing is necessary for our legitimate interests, namely promoting the Gathr Service to Service Providers and service improvement.
<b>Whether you have contacted a particular Service Provider.</b> When you contact a Service Provider through the Gathr Service, we generally collect and use this information a processor on behalf of the relevant Service Provider. We do,	We use this information to identify if the Service Provider owes us any amounts in respect of the introduction of a User to the Service Provider through the Gathr Service.	Where we act as a controller of this personal information, the processing is necessary for our legitimate interests, namely administering and managing our relationship with the relevant Service Provider.

however, also use this information as a controller for the purposes set out in the "How we use it" column.	We use this information to generate aggregated statistics about how the Gathr Service is used, such as information about interest in specific types of Service Provider. We use this aggregated information to report to Service Providers and inform how we can improve the Gathr Service.	The processing is necessary for our legitimate interests, namely promoting the Gathr Service to Service Providers and service improvement.
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#### 4.8 When you recommend a Service Provider to us

If you recommend a Service Provider to us, we will collect and use the following information:

Personal information	How we use it	Legal basis we rely on
<b>Your contact details</b> , such as your name, email address, job title and information about the organisation you work for.	We use this information to communicate with you about your recommendation.	The processing is necessary for our legitimate interests, namely following up on and confirming details contained in referrals.
<b>Information about the Service Provider you recommend</b> , such as the name of the Service Provider, the industry they are in, their website and contact details.	We use this information to communicate with you and the Service Provider about your recommendation.	The processing is necessary for our legitimate interests, namely following up on and confirming details contained in referrals.
	We use this information to determine if you are eligible for a referral reward.	The processing is necessary for the performance of a contract with you, namely the terms governing our referral process.
Information about whether the Service Provider joins the Gathr Service following your referral.	We use this information to determine if you are eligible for a referral reward.	The processing is necessary for the performance of a contract with you, namely the terms governing our referral process.
<b>Your payment details</b> , such as your bank account number.	We use this information to pay you any referral reward for which you are eligible	The processing is necessary for the performance of a contract with you, namely the terms governing our referral process.

#### 4.9 When you visit and browse the Website

We also automatically collect certain personal information about you and about how you access the Website.

Personal information	How we use it	Legal basis we rely on
<b>Device and browser information</b> , such as your IP address, operating system, browser type, browser window size and screen resolution.	We use this information to present the Website to you in the correct format for your device and browser.	The processing is necessary for the performance of a contract with you.
	We use this information to analyse the performance of the Website, identify errors and ways in which we can improve the Website.	We will only use your personal information in this way if you have given us your consent to do so.
<b>How you access and use the Website</b> , such as the time you access it, the page from which you came to the Website and the page you go to when you leave the Website, how long you access the Website for, the pages you view, the links you click and any errors you experience when browsing the Website.	We use this information to analyse the performance of the Website, identify errors and ways in which we can improve the Website.	We will only use your personal information in this way if you have given us your consent to do so.

#### 5. COOKIES AND SIMILAR TECHNOLOGIES

5.1 Cookies are pieces of code that we transfer to your computer's hard disk to store or collect information. We use cookies and similar technologies to collect certain personal information about how you access and use the Website.

5.2 For information about the cookies we use on the Website please see our cookie preference centre, which you can access when you initially browse the Website and at any time after that by clicking on the floating cookie widget on the Website.

5.3 Other than cookies that are required to operate the Website, we will only place cookies on your device or use these technologies to collect information with your consent. If you would like to withdraw your consent to non-essential cookies, you can do this by updating your cookie settings through the cookie widget on the Website.

5.4 Most browsers will also allow you to disable all cookies through your browser or mobile settings. These settings will typically be found in the "options" or "preferences" menu of your browser. Please note that if you choose to refuse cookies you may not be able to use the full functionality of the Website.

## 6. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

6.1 Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the following periods:

Personal information	How long we keep it
Contact details and your comments and questions in relation to the Gathr Service.	If you contact us as a prospective Service Provider or User, we will keep your contact details, comments and questions for 2 years from our last contact with you.
Information associated with User Accounts and information about key contacts at Service Providers.	For as long as the Service Provider is listed on the Gathr Service and for 6 months thereafter.
Information about Service Providers that are sole traders (other than information about invoices and payments made by the Service Provider)	For as long as the Service Provider is listed on the Gathr Service.
Information about invoices and payments made by Service Providers that are sole traders.	For as long as the Service Provider is listed on the Gathr Service and for 7 years thereafter.
Support requests.	For up to 1 year from the date of receipt.
Reviews left by Users.	For as long as the relevant Service Provider is listed on the Gathr Service and for 6 months thereafter.
Information relating to Service Provider referrals.	For as long as necessary to review the referral, determine eligibility for and pay out a referral reward.
Device information, information about how you access and use the Website and approximate location.	This information is normally anonymised and aggregated on collection. The information collected for analytics may, however, be retained in identifiable form to enable historical analytics reporting and comparisons. This is generally kept for no longer than 14 months.

## 7. HOW WE SHARE YOUR PERSONAL INFORMATION

7.1 We may share the personal information we collect and use for our own purposes as follows:



Recipients	Why we share it	Lawful basis
<p><b>Companies that provide services to us.</b></p>	<p>We may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, such as providing hosting or other technical services such as analytics services or communication services.</p>	<p>These recipients will use your personal information as processors on our instructions.</p>
<p><b>Purchasers and third parties in connection with a business transaction.</b></p>	<p>Your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.</p> <p>These recipients will use your personal information to assess the potential transaction with us, and otherwise only as disclosed in this privacy policy.</p>	<p>The lawful basis we rely on for transferring this personal information is that the processing is necessary for our and the third party's legitimate interests, namely assessing and executing a potential transaction with us.</p>
<p><b>Law enforcement, regulators and other parties for legal reasons.</b></p>	<p>We may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or personal safety of Gathr, its users or others.</p> <p>These recipients will use your personal information in the performance of their regulatory or law enforcement role.</p>	<p>The lawful basis we rely on for sharing personal information with these recipients is that the processing is either necessary to comply with a legal obligation to which we are subject, or is necessary for our legitimate interests, namely enforcing our rights or complying with requests from regulatory authorities.</p>

## 8. INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION

- 8.1 We may transfer personal information as described above in paragraph 7. This may mean that your personal information may be transferred to and stored in countries outside the country you are in where we and our third-party service providers have operations.
- 8.2 These international transfers of your personal information will be made pursuant to appropriate safeguards in accordance with applicable law:

Where we may transfer your personal information	Safeguards that apply to that transfer
United States	The transfer is subject to standard contractual clauses approved by the UK Information Commissioner for the transfer of personal information, or the transfers are to recipients certified under the UK Extension to the EU-U.S. Data Privacy Framework.
Member States of the European Economic Area	Member States of the EEA are deemed to provide adequate protection for personal information under the UK Data Protection Act 2018.

- 8.3 We will take appropriate steps to ensure that your personal information is treated securely and in accordance with applicable law and this privacy policy regardless of where it is processed.
- 8.4 If you wish to enquire further about the safeguards we use, please contact us using the details set out at paragraph 3.

## 9. YOUR PRIVACY RIGHTS

- 1.1 You have the following rights in respect of your personal information that we hold:
- (a) **Right of access.** You have the right to obtain:
- (i) confirmation of whether, and where, we are processing your personal information;
  - (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
  - (iii) information about the categories of recipients with whom we may share your personal information; and
  - (iv) a copy of the personal information we hold about you.
- (b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.

- (c) **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.

**1.2 You also have the right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case.**

1.3 If you wish to exercise one of these rights, please contact us using the contact details in paragraph 3.

1.4 If you reside in the UK, you have the right to make a complaint at any time to the Information Commissioner's Office ("**ICO**"), the UK regulator for data protection issues. You can make a complaint via the ICO's website (<https://ico.org.uk/make-a-complaint/>). This website also provides additional contact details for the ICO.

## **10. SECURITY**

We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on our secure servers. Unfortunately, however, no security measures will always be completely effective. We will notify you in accordance with applicable laws if we become aware that your personal information has been compromised.

## **11. OUR POLICY TOWARDS CHILDREN**

The Website is not directed at persons under 18 and we do not knowingly collect personal information from or about children. If you become aware that we have collected information about your child without your consent, then please contact us using the contact details at paragraph 3 so that we can take steps to remove such information.

## **12. CHANGES TO THIS POLICY**

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy, we will update the "last modified" date at the top of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.