



# 360Globalnet Privacy Policy

*This Privacy Policy is effective as of June 2024*



## Your rights

Under GDPR (General Data Protection Regulations), you have the right to access and rectify your personal data, which means you can ask us to:

- correct data about you that is wrong or ambiguous,
- complete missing data,
- update out-of-date data, or
- delete data that we are not allowed to collect.

You also have the right to request the 'limitation of the processing' - this gives you the right to restrict the processing of your personal data in certain circumstances. You can also tell us what you want us to do with your personal data when you die.

You can request the portability of your personal data if you have given your consent to us processing your data, or if the legal basis for processing your data is for the performance of a contract.

If the legal basis for our processing of your data is consent, you can withdraw your consent at any time.

You can exercise your rights by sending:

- an email to [dataprotection@360globalnet.com](mailto:dataprotection@360globalnet.com)
- or a letter to

The Data Protection Officer, 360Globalnet Ltd, Bourne House, 475 Godstone Road, Whyteleafe, Surrey CR3 0BL

We will manage your request within a maximum period of 30 days.

## Complaints

In the event of a dispute, please contact us first to give us the opportunity to resolve it, otherwise you may file a complaint with the ICO here: <https://ico.org.uk/global/contact-us/contact-us-public/>

## How we secure your personal data

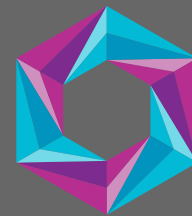
360Globalnet has put in place safeguards to ensure the confidentiality and security of your personal data. We have applied technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing.

We use the industry-standard security protocol called Transport Layer Security (TLS) for sending data to our website, for example, when you use the 'Contact Us' function, and for all client data. You can check this by looking for a closed lock icon at the bottom of your web browser or looking for "https" at the beginning of the address of the web page.

Although we use encryption to protect your data please be aware that no method of transmission over the Internet is 100% secure. Although we take reasonable security measures to protect your personal data when we receive it, you also need to ensure you take appropriate steps to protect your personal data.














Your data will be processed within the UK or EEA, under GDPR.

# Your personal information: how we secure it, why we might collect it and how we might use it



## Collection and using your data

We might collect your personal information for different reasons. We have listed those reasons below:

1. Responding to your request for information, an order, or support 
2. Contacting employees, contractors, advisers and authorised users of our clients, prospects, partners and suppliers  
3. Access and use of websites or other online services  
4. Marketing  
5. Sharing of Personal Information  
6. Children's Personal Information
7. Applying for a job with us   
8. Visitor information 

We do not carry out automated decision making, including profiling, using your data

## Lawful Bases for processing your data

The icons below have been included in this policy to highlight the GDPR lawful basis for each 'reason for processing':



Article 6(1)(f)  
Legitimate Interests



Article 6(1)(b)  
Contract



Article 6(1)(c)  
Legal Obligations



Article 6(1)(a)  
Consent



## 1. Responding to your request for information, an order, or support

When you contact us (online or offline) we collect your personal information so that we can:

- carry out your request,
- give you access to a product or service,
- to provide you with support and
- to be able to contact you.

We keep this information:

- for our administrative purposes,
- so that we can defend our rights, and
- to carry on our relationship with you.

Our lawful basis for processing your data in this case is Article 6(1)(f) of GDPR - legitimate interests, which are:

- administrative purposes;
- carrying out our services effectively; and
- communicating with you when you have requested information about our services.

We will always make sure that our legitimate interests don't override your interests or fundamental rights.

We will store this information until:

- we have completed your request,
- you are no longer using the product or service,
- we have completed your support request or
- our relationship with you has ended.



## 2. Contacting employees, contractors, advisers and authorised users of our clients, prospects, partners and suppliers

We have relationships with clients or prospective clients, partners and suppliers, and they provide us with business contact information (such as name, business contact details, position or title of their employees, contractors, advisers and authorised users) so that we can:

- manage contracts,
- deliver products and services,
- provide support,
- send invoices and
- manage the services or the relationship.

We process data in these cases on the lawful bases of:

- Article 6(1)(b) – contract, to comply with our obligations under a contract, or
- Article 6(1)(f) - based on our legitimate interests or a third party's legitimate interests (like our clients')

We will store this information until either:

- our contract with you is ended,
- we have completed delivery of products and services,
- you no longer need our support,
- our invoice is paid or
- our relationship with any individual listed above is ended.

### 3. Access and use of websites or other online services

When you visit one of our websites, or use an online service, and where you provide your consent, we use Google Analytics cookies to record information so that we can give you access and for the operation of the website or service. It is also so that we can comply with security and legal requirements that are needed to operate our site, such as:

- passwords,
- IP address and
- browser settings.

We might also collect information about your activities during your visit to personalise your website experience, such as:

- recording your preferences and settings, and
- to collect statistics

to help us improve and further develop our websites, products and services.

We make sure you cannot be directly identified by Google Analytics data. We do this by using Google Analytics' IP address anonymisation feature and by removing any other personal data from the titles or URLs of the pages you visit. We will not combine analytics information with other data sets in a way that would directly identify you. This website does not enable 'Do Not Track' cookie settings in your browser.

By clicking "Accept" to cookies consent, you agreed to the storing of cookies on your device to improve your site navigation, for us to be able to analyse site usage, and to help our marketing.

The lawful basis we rely on to process your personal data in this case is either:

- Article 6(1)(a) consent – for example, when we require your consent for the cookies we use, or
- Article 6(1)(f) – based on our legitimate interests.

#### How we store cookies, and for how long:

- 1) We keep Essential Site Cookies until you close the browser window, then it is deleted.
- 2) We keep the Cookie warning message cookie – CookieWarningDismissed – (this is saved when you choose to dismiss the cookie warning message) for 1 year, then it is deleted.
- 3) Google Analytics cookies are kept for different amount of times (see table below), before they are deleted:

| Cookie Name | Default Expiration Time  | Description   |
|-------------|--------------------------|---|
| __utma      | 2 years from set/update  | Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma 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 __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.   |
| __utmc      | End of browser session   | Not used in ga.js. Set for interoperability with urchin.js. 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 <a href="#">_setCustomVar</a> method with a visitor level custom variable. This cookie was also used for the deprecated <a href="#">_setVar</a> method. The cookie is updated every time data is sent to Google Analytics. |





## 4. Marketing

Most information we collect about you comes from our direct communications with you. We combine the personal information we collect to develop aggregate analysis and business intelligence for conducting our business and for marketing purposes.

You can choose to receive information by email, telephone or postal mail about our products and services, or sign up for subscriptions. When you visit our websites or use our services, we may provide you with personalised information. You can always opt-out from receiving personalised communication by sending us an email to [info@360globalnet.com](mailto:info@360globalnet.com) or by clicking the link in our marketing emails.

We may use your personal information for marketing, improvement or development of our products or services, or because of safety and security, or regulatory requirements. If this is the case, we do this based on the lawful bases of:

- Article 6(1)(a) of the UK GDPR - your consent, or
- Article 6(1)(f) - based on our legitimate interests or a third party's legitimate interests (like our clients')

We will only do this as long as it is not replaced by your interests or fundamental rights.

If we need to carry out an agreement with you, we will use your personal information so that we can do just that. It might be that we are replying to a request, fulfilling an order, or carrying out a transaction or agreement with you.

We will store this information until we have completed your request, fulfilled your order, completed the transaction or agreement with you, or you opt-out from receiving this marketing by sending us an email to [info@360globalnet.com](mailto:info@360globalnet.com) or by clicking the link in our marketing emails.



## 5. Sharing of Personal Information

We will always make sure that we have a lawful basis on which to share any information and document our decision making. We will not share your information with any third parties for the purposes of direct marketing.

Companies that provide services for us, for example drain clearing services or tree surgery, might process your data so that they can carry out that service. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we tell them to. They will not share your personal information with anyone apart from us. They will hold it securely and keep it for as long as we tell them to. We will not send your personal information outside of the UK.

We might share your personal information to protect our legal rights or property, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected. In some circumstances, for example under a court order, we are legally obliged to share information.

We process data, in these cases, on the lawful bases of:

- Article 6(1)(b) – contract, to comply with our obligations under a contract, or
- Article 6(1)(f) - based on our legitimate interests

See our 360GN UK GDPR Data Protection Policy on this website [www.360globalnet.com](http://www.360globalnet.com) for further information.

## 6. Children's Personal Information

We recognise the particular importance of protecting privacy where children and young people are involved. Our website and service is not directed at young people or children and we do not knowingly collect any personal information online from children or young people. If you believe that we may have collected personal information from a young person or child, please contact us here: [dataprotection@360globalnet.com](mailto:dataprotection@360globalnet.com), so that we can delete it.



## 7. Applying for a job with us

Our purposes for processing the information that you give us during the recruitment process is to enable us to decide if you are suitable for a job you have applied for, and to help us develop and improve our recruitment process.

The lawful bases we rely on for processing your personal data are:

- Article 6(1)(b) of the UK GDPR, which deals with processing necessary to perform a contract, or to take steps, at your request, before entering a contract, and
- Article 6(1)(f) for the purpose of our legitimate interests.

You might give us information about reasonable adjustments that you need under the Equality Act 2010 (the "Act"), then we will rely on:

- Article 6(1)(c) to comply with our legal obligations under the Act.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious, sexual orientation or ethnicity information is article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights.

We will also rely on an additional DPA 2018 processing condition:

- Schedule 1 part 1(1),

which relates to processing for employment purposes.

We might also process information about an applicant's criminal convictions and offences during the employment screening process. In this case, we may rely on the DPA 2018 processing condition:

- Schedule 1 part 2 paragraph 10(1)

If you are successful in your application we will retain your data for the duration of your employment and for up to 6 years after you leave (depending on the type of data).

If you are unsuccessful in your application or decide not to accept an employment offer, we will retain your data for 1 year post-campaign.

## 8. Visitor information



If you visit one of our offices we will record your personal information (name, identification and business contact information) and you will be recorded on closed-circuit television (CCTV), which operates at the buildings for security purposes. We process this information under:

- Article 6(1)(f) of UK GDPR - based on our legitimate interests for the security and safety of persons and belongings, as well as for regulatory purposes.

If we have recorded that data, we will keep it for no more than 30 days. If that data has been recorded by a managed office, please refer to their retention policy

## Any questions?

If you would like to ask us any questions about this Privacy Policy, please contact our Data Protection Officer **by emailing [dataprotection@360globalnet.com](mailto:dataprotection@360globalnet.com), or by writing to:**

**Data Protection Officer,  
360Globalnet Ltd,  
Bourne House,  
475 Godstone Road,  
Whyteleafe, Surrey CR3 0BL**