

# Grampian Business Finder Privacy Notice

This is the privacy notice of Grampian Business Finder by This Little Piggy (Scotland) Ltd. In this document, "we", "our", or "us" refers to Grampian Business Finder by This Little Piggy (Scotland) Ltd.

This Little Piggy (Scotland) Ltd is company number SC485654 registered in Scotland.

Our registered office is at Aberdeen Business Centre, 11 Bon Accord Crescent, Aberdeen AB11 6DE.

## Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
6. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## **The bases on which we process information about you**

The law requires us to determine under which of 6 defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **1. Information we process because we have a contractual obligation with you**

When you subscribe on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1.1. verify your identity for security purposes
- 1.2. promote services to you
- 1.3. provide you with our services
- 1.4. provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

By registering with Grampian Business Finder as a Business Member via our Website, you choose to accept the practices described in this Privacy Notice. We use the information that you provide for such purposes as set out here. Please note that it is possible to authorise another individual to operate and manage your account on your behalf. However, if you have such an arrangement in place, you still remain primarily responsible for the use of your account, and any liability that may arise in connection with that use, including for any and all payments due under it or claims brought against you in respect of that use.

## **2. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including Business Members and our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

When you have given us explicit permission to do so, we will pass your name and contact information to selected Business Members, potential customers or associates whom we consider may provide or utilise services or products you would find useful.

Information about our Business Members is an important part of Grampian Business Finder. We share Business Member information only as described here and with controls that either are subject to this Privacy Notice or follow practices at least as protective as those described in this Privacy Notice. We do not typically share personal information about Users who are not Business Members.

We share Business Members information on services and offers with their potential customers.

We work closely with our Member Businesses whereby you may have the option to buy products and services from them through the Website. We may also at the request of customers share their requirements on social media, with or without mentioning their names in order to provide them with the services requested. We may share anonymous, aggregate information with third parties for their own research and marketing purposes, but we will not share your personal information with such third parties without your consent.

We may appoint third party GDPR compliant companies and individuals as data processors to perform functions on our behalf. We will provide your personal data to such data processors in order for them to assist us in providing you with services. In some circumstances we may need to share personal data with such data processors in advance of you requesting a specific service, for instance so that the data processor can contact you regarding services that are within your membership package but to which you may not have signed up. The information shared with data processors may include your Grampian Business Finder User ID, name, email address, phone number and postal address. Our data processors will only have access to personal data needed to allow them to make our services available to you and will only use your personal data for this purpose. Examples of services provided on our behalf by our third party service providers include operation and administration of our member benefits portal, removing repetitive information from User lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit card payments, providing anti-fraud services and providing customer services.

As we continue to develop our business, we might sell or buy products, subsidiaries, or business units. In such transactions, User information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the User consents otherwise). Also, in the event that we or our successor or substantially all of our assets are acquired, User information will of course be one of the transferred assets.

With Your Consent other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information.

We offer many ways for Users to find, enjoy, and share content about Business Members from a range of sectors and a range of social media platforms. We encourage users to explore who else is using our Website and their public profiles. Most of Business Members listing information on our Website is publicly available to others. What may be shared or made visible on our Website includes your name and/or business name, profile picture, business details, qualifications, testimonials, social media applications that you link to your account and user content that you post on our Website. Your activity on

our Website may automatically appear in the activity feed of friends and users who follow our social media platforms.

We may use your public information to promote Grampian Business Finder and/or the Website and to help others find and follow you and/or your profile (content on the Website) through social media services.

We may also notify others via email or through social media services about your account activity if such activity is also of interest to your social media contacts or other users of our Website. Likewise, we may notify you about such activity of others.

If you connect your account on the Website to a social media platform, the default setting may allow your Website content to be shared on social media platforms including the information mentioned above. You understand that such information may be associated with, and published on, your social media account and on other accounts.

You can share information and content from your profile by using the share functionality on the Website. Please note that sharing such content on a social media platform means that the content may be posted as activity on the Website, regardless of your account settings. To share an individual item of content to a social media platform you will be prompted to enter your access credentials for that third-party service. Grampian Business Finder may store your social media platform usernames and an access token obtained from the social media platform, so that you are able to share content on that social media platform without entering your access credentials again.

You acknowledge and agree that the use of your information by any third-party website or social media platform will be governed by their own privacy policies.

While you can use your Marketing Preferences to choose what communications you receive from us, you can also manage your public information by changing your sharing preferences. However, please note that it may not be possible to make certain information private on our Website, including your name and/or business name, profile picture, and other business information. Please use your profile carefully and manage your account settings regularly.

To manage your sharing preferences on social media platforms, please visit your account settings.

To personalise your experience, we may share information we have collected about you with Facebook, Twitter and other social media platforms, such as high-level geographic information, your design preferences, settings and technical data. However, we take precautions to prohibit Facebook, Twitter and other social media platforms from attempting to identify you using the information we provide to them or by collecting additional information without your consent. Facebook, Twitter and other social media services may be able to identify you and associate the information previously provided by Grampian

Business Finder with you. You agree and understand that a social media provider's privacy policy governs its use of your information that we provide to it or that it collects from you.

Payment data: We will collect and process payment and financial data when you sign up as a Business Member or use our payment service to pay for services sourced through our Website. This information will be stored by third party payment processors Stripe. Stripe will provide us with some payment information about you, including a unique token, your payment card type, and the expiry date and last four digits of the payment card. This information will enable you to make additional purchases through the Website using the card details which you have previously provided.

If you choose to pay for the services by invoice, Grampian Business Finder will collect and transfer information accordingly.

We may also collect additional information including your postal code, mobile number and details of your transaction history.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at [hello@grampianbusinessfinder.co.uk](mailto:hello@grampianbusinessfinder.co.uk) or [www.grampianbusinessfinder.co.uk](http://www.grampianbusinessfinder.co.uk). However, if you do so, you may not be able to use our website or our services further.

You provide most information when you register as a Business Member or search for services, participate in a questionnaire, or communicate with customer services. For example, you provide information when you make an enquiry through the Website or through Business Members listed on our Website, provide information in your account, use our services, participate in conversation, and provide reviews. As a result of those actions, you might supply us with such information as your name, address, and phone numbers, credit card information, people who have helped provide the service, where you work, content of reviews and e-mails to us, personal description and photograph in your Business Member listing.

We collect this information:

- 2.1. to identify you as a Business Member of our Website, to address you, access your account, answer your questions and resolve your issues, to contact you and to let you know if you have won a prize in any competition or other promotion run by Grampian Business Finder.
- 2.2. to identify whether you have an account with us already or have had an account with us which we closed for, without limitation, violation of our Terms of Use or applicable Values.

- 2.3. to share your information with selected partners who may use or provide the information to other organisations for purposes including identity screening, credit checking, customer management and debt collection.
- 2.4. to share your information with selected partners who may use or provide information to other organisations to send you information about products or services (but only with your permission).
- 2.5. to allow us to send you introductions.
- 2.6. to allow us to market your services as a subcontractor to other Business Members.
- 2.7. to enable us to provide services to you such as identifying the Business Member best suited to undertake the work set out in a request for services or, if you are a Member, enable us to identify the jobs best suited to you.
- 2.8. to enable Business Members to respond to your enquiries.
- 2.9. to market our, or (where you have consented) selected partners', services to you via email updates.
- 2.10. to provide a reviews service which informs our Finders about the quality of service and delivery by our Business Members, to facilitate payment for services, and to carry out analysis (usually through aggregating information) on the way our services are used and your success rate if you are a Business Member.
- 2.11. to enable and promote Grampian Business Finder including the Website's features, content products and services made available through the marketplace, such as sharing, user interactions, notification and suggestions and integration with third party services.

Please note we will never ask you to confirm your password or payment details via email. If you receive an email that requests this information and appears to be sent from us, please treat it as fraudulent and do not reply or provide any information. In this instance we would ask you to get in touch via the contact us page on our website to provide us with further details.

### **3. Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

## **Specific uses of information you provide to us**

### **4. Information relating to your method of payment**

Your full payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

Membership payments transfer you to a secure page on the website of Stripe and it is not controlled by us.

### **5. Job application and employment**

If you send us information in connection with a job application, we may keep it for up to 3 years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for 6 years before destroying or deleting it.

### **6. Sending a message to our support team**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

## **7. Complaining**

When we receive a complaint about this Website, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## **8. Affiliate and business partner information**

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us, and to thank to you for such referrals.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

## **Use of information we collect through automated systems when you visit our website**

## **9. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

If you are a Business Member some cookies are necessary for essential website purposes including to provide you with services available through our Website and to use some of its features, such as access to secure areas. These cookies are necessary for us to supply you with certain online features like transactional pages and secure login accounts. You may disable any of these cookies via your browser settings. If you do so, various functions of the Website may be unavailable to you or may not work the way you want them to.

We use cookies in the following ways:

- 9.1. to tailor the Website to you meaning that when you continue to use or come back to the Website, we can provide you with our services as you have asked for them to be provided.
- 9.2. to track how you use our website.
- 9.3. to record whether you have seen specific messages we display on our website.
- 9.4. to keep you signed in our site.
- 9.5. to record your answers to the contact form on our site while you complete it.
- 9.6. to save your location preferences.
- 9.7. to remember settings you have applied, such as layout, text size, preferences, and colours.

9.8. to show you when you are logged in.

9.9. to store accessibility options.

Third party cookies are the sharing buttons allowing you to share content onto the social networks - they have their own policies on information they collect and it's worth checking them out individually to ensure their suitability.

## **10. Links**

Our Website may include third-party advertising and links to other websites. If you access other websites using the advertising or links provided, the operators of those websites may collect information from you which will be used by them in accordance with their privacy notice which may differ from ours. For more information about third-party advertising on our Website, please read our Cookies policy.

## **11. Facebook and other Social Media platforms**

Business Members may integrate your accounts with social media platforms including Facebook, Twitter, LinkedIn, Skype, YouTube, Pinterest, Instagram, WhatsApp and Vevo; Customers and Business Members may submit reviews using Endorsal. By doing so you authorise us to collect your information, such as your username, encrypted access credentials, and other information, that may be available on or through your social media account. Such information may include your name, profile picture, country, hometown, e-mail address, date of birth, gender, friends' names and profile pictures and networks. We may store this information and use it for the purposes explained in here and to verify your credentials with social media platforms.

## **12. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution, login, e-mail address, password, computer and connection information such as browser type, version, and time zone setting, browser plug-in types and versions, operating system, and platform; purchase history, which we sometimes aggregate with similar

information from other Users; the full Uniform Resource Locator (URL) clickstream to, through and from our Website, including date and time; cookie number; parts of the site you viewed or searched for; and the phone number you used to call our Customer Services. We may also use browser data such as cookies, Flash cookies (also known as Flash Local Shared Objects), or similar data on certain parts of our Website for fraud prevention and other purposes. During some visits we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

We collect this:

- 12.1 to understand the technology our Business Members are using and that we must design and build products for.
- 12.2 to understand the online behaviour of our Business Members.
- 12.3 to manage our exposure to and to prevent and detect fraud.
- 12.4 to aggregate this data with similar information from other Members to help inform product development.

Where your device is configured to allow it, we may also receive a confirmation that you've opened our communication (e.g. email) since we wish to ensure that our emails are interesting to our Business Members and that you receive relevant information from us.

#### Mobile/Tablet

Where you access our Website or services from a mobile or tablet device, we may receive information about your location and your device including a unique identifier for your device. Most mobile and tablet devices provide users with the ability to disable location services. Most likely, these controls are located in the device's settings menu. For information about specific devices, please refer to your mobile's user manual. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or your device manufacturer.

We collect this to provide you with location-based services (where you give us

permission).

Examples of information we receive from other sources include information from Business Members about payments for services, or information from Customers about your fulfilment of jobs if you are a Business Member.

We collect this:

- 12.5 to analyse on an aggregate and anonymous basis how much Business Members are spending, and we may share this with selected partners.
- 12.6 to analyse and manage our investment in online marketing.
- 12.7 to help prevent and detect fraud.

Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the General Data Protection Regulation 2018.

Working with other businesses, we may offer joint or co-branded products among other offerings. You should check the Privacy Notices for each of these businesses to understand how they use your personal information.

Examples of information you can access easily via our Website include up-to-date information regarding services purchases you have made; personal information (including name, e-mail, password, work area and communication settings); payment settings; reviews you have provided or received; your account information; and your profile. If you would like to access other information that we hold about you, please contact us.

### **13. Our use of re-marketing**

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

## **Disclosure and sharing of your information**

### **14. Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

### **15. Credit reference**

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

### **16. Data may be processed outside the European Union**

Our website is hosted in London UK via a Scottish website developer.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America or in Australia.

## **Access to your own information**

### **17. Access to your personal information**

17.1. At any time, you may review or update personally identifiable information that we hold about you.

17.2. To obtain a copy of any information held about you you may send us a request at [hello@grampianbusinessfinder.co.uk](mailto:hello@grampianbusinessfinder.co.uk)

17.3. After receiving the request, we will tell you when we expect to provide you with the information.

## **18. Removal of your information**

If you wish us to remove personally identifiable information from our website, you may contact us at [hello@grampianbusinessfinder.co.uk](mailto:hello@grampianbusinessfinder.co.uk)

This may limit the service we can provide to you.

## **19. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before otherwise taking any action. This is important to safeguard your information.

## **Other matters**

### **20. Use of site by children**

20.1. We do not sell products or provide services for purchase by children, nor do we market to children.

20.2. If you are under 18, you may use our website only with consent from a parent or guardian.

20.3. We collect data about all users of and visitors to these areas regardless of age.

20.4. Child visitors will be subject to whatever on-site marketing they find, wherever they visit.

### **21. Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

Please protect against unauthorized access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

## **22. How you can complain**

- 22.1. If you are not happy with our privacy policy or if you have any complaint, then you should tell us by email. Our address is [hello@grampianbusinessfinder.co.uk](mailto:hello@grampianbusinessfinder.co.uk)
- 22.2. If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 22.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns>
- 22.4. If you choose to visit the Website, your visit and any dispute over privacy is subject to this Privacy Notice, including limitations on damages, resolution of disputes, and application of Scottish Law. Our business changes constantly, and our Privacy Notice will change. We may e-mail periodic reminders of our notices and conditions, but you should check our Website frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We endeavour to never materially change our policies and practices to make them less protective of Business Member information collected in the past without the consent of affected Business Members.

## **23. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 23.1. to provide you with the services you have requested;
- 23.2. to comply with other law, including for the period demanded by our tax authorities;

- 23.3. to provide you with news via our mailing list.
- 23.4. If you subscribe to our mailing list, you will receive email news from Grampian Business Finder and our Business Members. As a Business Member you will receive Business Member specific updates. You may unsubscribe from either of these mailing lists at any time.
- 23.5. We use MailChimp to deliver our news to you, Mailchimp is GDPR compliant and the information going into MailChimp are your first name name and email address, MailChimp tracks this to give us analytics on how successful our mailings are by way of statistics, and benchmarking to industry averages. This is MailChimp's privacy policy [www.mailchimp.com/legal/privacy](http://www.mailchimp.com/legal/privacy) - MailChimp is a popular and highly regarded mailing platform.
- 23.6. If you are already on our mailing list you can unsubscribe anytime by emailing [hello@grampianbusinessfinder.co.uk](mailto:hello@grampianbusinessfinder.co.uk) or using the contact form here. You also have the right to be "forgotten" by us and all information we hold on you will be erased if you prefer.
- 23.7. The contact form here is enabled by the website provider Joomla and this is their privacy policy <https://www.joomla.org/privacy-policy.html> - Joomla is a popular and highly respected web platform.

## **24. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## **25. Review of this privacy policy**

We update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to save a copy for your records.

If you have any question regarding our privacy policy, please contact us.