

Graphical Financial Analysis Limited - Privacy Policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our clients and as a data processor with respect to the personal data of our clients' customers / members.
- 1.3 We use cookies on our website.
- 1.4 In this policy, "we", "us" and "our" refer to Graphical Financial Analysis Limited.

2. How we use your personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Microsoft Azure and Google Analytics. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent and/or a contract between you or your employer and us and/or taking steps, at your request or at your employer's request, to enter into such a contract.
- 2.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you or your employer and us and/or taking steps, at your request or at your employer's request, to enter into such a contract.
- 2.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name and email address. The profile data may be processed for the performance of a contract between you or your employer and us and/or taking steps, at your request or at your employer's request, to enter into such a contract.
- 2.5 We may process personal data relating to your customers / members that are provided in the course of the use of our services ("**service data**"). The service data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you or your employer and us and/or taking steps, at your request or at your employer's request, to enter into such a contract.
- 2.6 We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers and keeping records of those communications. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships.

- 2.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is the performance of a contract between you or your employer and us and/or taking steps, at your request or at your employer's request, to enter into such a contract.
- 2.8 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our service and business and communications with users.
- 2.9 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3. Providing your personal data to others

- 3.1 We may disclose your personal data and/or the personal data of your customers / members to any member of our group of companies. This means our subsidiaries, our ultimate holding company and all its subsidiaries insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 We may disclose your personal data or the personal data of your customers / members to our suppliers or subcontractors insofar as is reasonably necessary for us to supply our services.
- 3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

- 4.1 We have offices and facilities in the Republic of Ireland. The European Commission has made an "adequacy decision" with respect to the data protection laws in the EEA. Transfers to countries within the EEA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- 4.2 The hosting facilities of our supplier Microsoft Azure are situated in the EEA. The European Commission has made an "adequacy decision" with respect to the data protection laws of the countries within the EEA. Transfers to countries within the EEA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will delete your personal data and the personal data of your customers / members as soon as is practicable upon termination of your contract with us, in a timeframe agreed with you, allowing adequate time for us to provide you with this data in an appropriate format.
- 5.4 Where we are acting as the data processor and you are the data controller, we will delete the personal data of your customers / members either at your request or otherwise seven years after the personal data has been collected or updated.
- 5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

- 6.1 We may update this policy from time to time by publishing a new version on our website and/or supplying you directly with a new version.

7. Your rights

- 7.1 In this Section 7, we have summarised the rights that you have under data protection law, including the GDPR. Some of the rights are complex, and not all of the details have been included in our summaries. A detailed description of your rights / the rights of your customers / members is contained here: <https://gdpr-info.eu/>
- 7.2 Your principal rights (and the rights of your customers / members) under data protection law (including the GDPR) are:
 - (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 7.3 You (and your customers / members) have the right to confirmation as to whether or not we process your / their personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you and/or your customers / members with a copy of your / their personal data.
- 7.4 You (and your customers / members) have the right to have any inaccurate personal data about you / them rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you / them completed.

- 7.5 In some circumstances you (and your customers / members) have the right to the erasure of your / their personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you (they) withdraw consent to consent-based processing; you (they) object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.6 In some circumstances you (and your customers /members) have the right to restrict the processing of your (their) personal data. Those circumstances are: you (they) contest the accuracy of the personal data; processing is unlawful but you (they) oppose erasure; we no longer need the personal data for the purposes of our processing, but you (they) require personal data for the establishment, exercise or defence of legal claims; and you (they) have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your (their) personal data. However, we will only otherwise process it: with your (their) consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You (and your customers / members) have the right to object to our processing of your (their) personal data on grounds relating to your (their) particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you (they) make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You (and your customers / members) have the right to object to our processing of your (their) personal data for scientific or historical research purposes or statistical purposes on grounds relating to your (their) particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 To the extent that the legal basis for our processing of your personal data (and the data of your customers / members) is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you (they) are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means, you (they) have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.11 If you (or your customers / members) consider that our processing of your (their) personal information infringes data protection laws, you (they) have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You (or your customers / members) may do so in the EU member state of your (their) habitual residence, your (their) place of work or the place of the alleged infringement.
- 7.12 To the extent that the legal basis for our processing of your personal information (and the personal information of your customers / members) is consent, you (they) have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8. About cookies

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you (or your customers / members) may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

- 9.1 We may use cookies for the following purposes:
 - (a) authentication - we may use cookies to identify you when you visit our website and as you navigate our website.
 - (b) status - we may use cookies to help us to determine if you are logged into our website.
 - (c) personalisation – we may use cookies to store information about your preferences and to personalise the website for you.
 - (d) security - we may use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.
 - (e) analysis - we may use cookies to help us to analyse the use and performance of our website and services.
 - (f) cookie consent - we may use cookies to store your preferences in relation to the use of cookies more generally.

10. Cookies used by our service providers

- 10.1 Our service providers may use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 We use Microsoft Azure and Google Analytics to analyse the use of our website. Microsoft Azure and Google Analytics gather information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website.

11. Managing cookies

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on our website and service.

12. Our details

12.1 This website is owned and operated by Graphical Financial Analysis Limited.

12.2 We are registered in the Republic of Ireland under registration number 491923, and our registered office is at Castlewood, Killiney, County Dublin, Republic of Ireland.

12.3 Our principal place of business is at Castlewood, Killiney, County Dublin, Republic of Ireland.

12.4 You can contact us by using our website contact form or by sending an e-mail to: info@graphicalfinancialanalysis.com

13. Data protection officer

13.1 Our data protection officer is Colm Begley.