



Fortem Global Privacy Notice

Welcome to the Fortem Global Privacy Notice

This Privacy Notice is designed to help you understand everything you need to know about the what, why and how's of our data gathering and processing operations, and what your legal rights are.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and we will keep you informed if there are any changes to the way we process your personal data in the future, before making them.

Fortem Global takes its responsibility of protecting your data very seriously and we do advise you get to know our practices – If there's anything in this policy you don't understand or if you want to ask any questions, please feel free to contact us using any of the details below.

Who are we?

We are Fortem Global, a Private limited company registered in England at 6-8 York Place, Leeds, LS1 2DS. 10093325 In this document Fortem Global will sometimes be referred to as "we".

What kind of personal data might we ask you to provide?

Fortem Global will only ever ask for personal data if it is required for a specific purpose; with that in mind, we have created a full list of all the kinds of personal data that we may ask you to provide in order to achieve those purposes. The kinds of personal data we may collect are: Name, email, telephone, address, bank details, VAT numbers

Why do we collect personal data?

We will use personal data firstly to fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to meet the terms of any such contract you will be required to provide the relevant personal data or we will not be able to deliver the goods and/or services you want. In such cases, the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We may also process your personal data in accordance with our legitimate business interests; this is on the considered measure that we need the personal data to achieve the various purposes and that it could be reasonable for an individual to expect their data to be used for those purposes.

Our data processing activities conducted on the lawful basis of 'legitimate interests' are:

- To fulfil contractual obligations between the two parties
- To provide you with goods and services you are looking for
- To inform you of other goods and services we provide, or offers that may interest you (direct marketing)
- To send notifications on subjects you have subscribed to, or otherwise asked us to keep you informed of
- To notify you of any changes to the goods and/or services we provide or have provided, that may affect you
- To recognise when customers re-engage with our services
- To allow us to support and maintain our products in active service

We may also process your personal data in order for Fortem Global to comply with our various legal obligations; this might include:

- Providing for financial commitments between us and yourself, or to relevant financial authorities
- Complying with industry regulatory requirements and any self-regulatory schemes
- Carrying out required business operations and due diligence; e.g. administration, security, reorganisations, investment or corporate/asset sales
- Cooperating with relevant authorities for reporting criminal activity, or to detect and prevent fraud

Where did we obtain your personal data?

Other than collecting data directly from you;

We may gather personal data from sources including:

- Technical sources that gather data over time when you visit our online platforms
- Some platforms may make use of your various device settings that allow us to identify your geographical location, these systems use technology such as IP Address mapping, WiFi, GPS signals and cell tower positioning
- From third-party organisations, which can mean your personal data has been provided directly by another company for a specific purpose, or where you may have accessed our platforms through a third party online service

Who will we share your information with?

We may share your personal data with the other members of our group of companies, which includes any subsidiary or the holding company (each as defined by the Companies Act 2006) of Fortem Global.

In order to achieve the above-stated purposes for which we process your personal data, we may need to share your personal data with various third-party service providers who act as data processors.

We may share your personal data with third party organisations acting as data controllers or with specific individuals, groups or other organisations who act as neither data controllers nor data processors, but only where we are either legally require to do so by

law or where doing so is necessary to achieve the intended stated purpose of processing the data

In the event that we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

Where is my data going to be stored?

Fortem Global will not transfer your personal data to any country outside the European Union (EU) other than those that have been granted an adequacy decision under the General Data Protection Regulation (GDPR).

We may be required to transfer your personal data to organisations who intend to transfer the data outside the EU. Where such transfers of data take place, we shall ensure that contracts are in place between the parties involved that ensure the recipient organisation has a suitable standard of data protection in place

Fortem Global as a part of its standard business practices may be required to transfer your personal data to countries outside the European Union (EU), or to organisations who intend to transfer the data outside the EU. Where such transfers of data take place, we shall ensure that at least one of the following control measures are in place:

The data transfer is necessary in order to fulfil a contract between the data controller and you or to satisfy pre-contractual requirements that have been requested by you

How long will we keep your data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was gathered, in line with this privacy notice.

For determining when personal data should be erased we shall take into consideration the amount of and sensitivity of the personal data we have, the amount of harm that could be caused by a data breach, the benefits of the purposes the data is being used for and any legal requirements that we are bound to.

You may request that we erase your personal data at anytime, though in cases where there is a remaining relevant or legal reason why we are required to keep the data we may opt to restrict the amount of processing being conducted to what is absolutely necessary in line with your legal rights in order to minimise the impact the processing will have.

Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Fortem Global we take your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

You have the Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using any of the details below.

The Right to Rectification

This one is fairly straightforward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use or have used, your personal data you may do so freely.

The Right to Portability

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine-readable format, either to your or to another provider of your choosing.

The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters; if however, you would like to complain about Fortem Global to a supervisory authority you may do so by contacting the Information Commissioners Office on 0303 123 1113, or anyone of the other reporting methods listed on their website - <https://ico.org.uk/concerns>

Our contact details

If you wish to get in touch with Fortem Global please do so with any of the following contact details:

Fortem Global Ltd
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