

# Gentleman's Military Interest Club

## Privacy (& Cookie) Policy March 2023

Gentleman's Military Interest Club (GMIC) is an online community. It requires members to register using the minimum of personal data. GMIC are committed to protecting and respecting your privacy. On this page we describe how we may make use of the personal data that you may supply to us when you visit this website.

We are a UK based organisation and controller of the personal information that you provide to us. This privacy notice sets out how, why and for how long we will use your personal data. It also explains your legal rights as a data subject and how to exercise them. Please note we are not lawyers, this Privacy Policy has been developed in a transparent and open way, in order to be compliant with the legislation set out within the UK Data Protection Act 2018 and the EU General Data Protection Regulation.

To better protect your privacy, we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available in the footer of all our pages and at every point where personally identifiable information may be requested.

Here are a few general principles to keep in mind as you read through this Privacy Policy:

- By visiting this site or otherwise providing us with personal information, you agree that we may collect, use and share your personal information as described in this Privacy Policy. If you do not agree, please do not visit GMIC or provide us with any personal information
- As used in this Privacy Policy, "personal information" includes information that can be used to identify you as an individual or allow someone to contact you, as well as information attributed with such information
- We may at any time and at our sole discretion update this Privacy Policy by posting the updated Privacy Policy here along with the new effective date

## QUICK LINKS

Click on one of the links below to jump to the listed section:

1. [Summary of Information Provided by You](#)
2. [Information we collect](#)
3. [How we use the information we collect](#)
4. [How we store and protect personal information](#)
5. [Links to external content](#)
6. [Children](#)
7. [Accessing and correcting your personal information](#)
8. [Cookies & Tracking Technologies](#)
9. [Users from the UK & EU\(EEA\)](#)
10. [Changes to our Privacy Policy](#)
11. [How to contact us](#)

## 1. Summary of Information Provided By You or Third Parties

We collect information you provide to us directly when you use our website. This includes:

- **Account Information:** To create an account, we collect your username, and email address, and password. We collect additional information that you choose to add to your account or public user profile, such as a profile picture or information about your hobbies, interests, activities or property (such as the type of vehicle you own). Your username is public, and other account information may be public depending on how your account profile is configured.
- **Transactional information:** We may collect your name, and contact information when you purchase a product or service through our website (such as a subscription or classified advertisement). Payments are processed by third-party payment processors (PayPal & Stripe), so please refer to the applicable processor's terms and privacy policy for more information about how payment information is processed and stored.
- **Third Party Networks:** If you use a third party network (including a social media account) to create an account on GMIC, to log-in to our Site, or if you otherwise interact with a third party network through our website (such as by using a plug-in), we will receive personal information from the third party network, such as your username, email address, gender, public profile information and any other information that you have agreed to share with us, whether explicitly or through your privacy settings. You should consult the respective privacy policies of these third party networks for information about their practices.
- **Content you submit:** GMIC is a public forum and communication platform that allow you to communicate with other users, post information, content, images, photos or videos, post your opinions on surveys, or submit reviews or ratings (collectively, your "Content"). Your content will be associated with your public user profile. Your Content and public user profile is public, unencrypted and non-confidential. This means that it can be read and used by others, including advertisers. We are not responsible for the information you choose to submit in these public areas. You should exercise caution when deciding to disclose personal information in public areas of GMIC. We strongly recommend against sharing any personal sensitive information that could directly or indirectly be traced to any individual, including yourself.
- **Other information:** We may collect personal information with your consent, where required or permitted by law, or when you choose to provide other information directly to us. For example, we may collect information when you fill out a form, participate in a survey, poll, contest or promotion, volunteer to assist with the running of the site, request customer support or otherwise communicate with us.

## 2. Information We Collect

When you use or access our website, we automatically collect information about you. This includes:

## GMIC Privacy (& Cookie) Policy February 2023

- **Geographic Location:** We collect geographical location information through your IP address. This enables us to provide location-specific information to you.
- **Usage Data:** We may log information when you access and use our website. This may include your IP address, user-agent string, browser type, operating system, referral URLs, device information (e.g., device IDs), pages visited, date/time stamp, links clicked, the requested URL, hardware settings, and search terms and other similar information. See Cookies below.

We do this primarily for statistical purposes, to find out things such as the number of visitors to various parts of the site, but we also monitor for malicious and abusive usage. If you are visiting GMIC as a guest or visitor, we collect the information in a way which does not identify anyone. Log files are maintained and analysed for all file requests on this website's web servers. We will not associate any data gathered from this site with any personally identifying information other than where specifically requested, when registering or using this site as a member. If we do want to collect personally identifiable information through our website, we will be up front about this. We make it clear when we collect personal information and will explain what we intend to do with it.

### 2.1 Personal Information and why we collect it

We may collect and process the following data about you:

#### 2.1.1 Information you provide to us on registration

You are required to provide us information about yourself when registering as a member of GMIC, and creating an online registered member's profile. This is an opt in process and is a requirement of membership of this site. Being a member brings benefits, which in turn requires some information to be logged onto our servers, to enable us to deliver this free service in the best way possible. The information you need to provide in the course of registering as a member, includes creating a unique username and providing a current active mail address. We may also ask you to provide the details of your country of residence, so that other members can better identify with you. We also offer an opt in to receive further emails from us, this is so we can occasionally contact you about news, site information, or other products relating to GMIC. This is an optional requirement and is switched off by default, it requires you to opt in, not opt out. We will not ask you to provide any other sensitive personal data from you as part of the registration process.

Your internet protocol (IP) address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp of access at the time of registration will be stored and recorded against your personal account. This is primarily used as a security feature to prevent malicious use of our systems, but also provides further statistical information. Some information will also be shared with third parties during the registration process (see 1.1 C)

# GMIC Privacy (& Cookie) Policy February 2023

## 2.1.2 Information our servers collect about you

As a registered account holder/member this website uses server logs which records all your interactions with this website, by reference to your user name and computer information which may include browser type, Internet service provider, platform type, device type, operating system, date and time stamp of access, and internet protocol address and other information at the time of visiting us. We may use the data generated by these logs to analyse site usage, to investigate any site performance issues, or investigate abuse of our systems or website. During the course of membership you may also provide voluntary personal data within your profile or to other GMIC members in the course of posting to the community, or using the internal communications platform provided for members. Such data is recorded and will be logged on our servers.

## 2.1.3 Additional Personal Information collected for specific purpose

GMIC occasionally for fund raising purposes, promotes goods for sale, offers fee paying membership packages, accepts donations and/or sells advertising space. Additional personal information such as name, address or telephone number will be required for contractual purposes to assist with the sale of said goods or services as well as recording the sale for tax purposes. In these circumstances GMIC may retain this additional personal information for as long as required for the completion of a sale, as well as retaining relevant personal data provided during the course of a purchase to meet contractual obligations, and meet any tax obligations under UK Law.

## 3. How we use the information we collect

We generally use the information we collect about you to operate, manage and maintain GMIC, to provide our products and services, and to accomplish our purposes and objectives, including:

- to administer and manage our website and provide our services, such as to create and administer accounts and facilitate the use and enjoyment of forums and its communication platforms;
- to enable geographic-specific features, such as geographic-specific information;
- to provide the product, service, feature or information you have requested and to fulfil your transactions, including processing payments;
- to send you administrative messages, updates, legal notices, technical notices or security alerts;
- to conduct research and development, analyse and understand trends and user behaviour and to improve GMIC products and services;
- to provide customer service, technical and other support;
- to protect the safety of GMIC and our users, including to ensure compliance with our Terms of Use and other policies, block suspected spammers, address abuse, and detect and prevent fraud;
- to provide you with newsletters, information, promotional offers and other advertising about us or our advertising partners;

## GMIC Privacy (& Cookie) Policy February 2023

- to facilitate your participation in a contest or similar promotion, or a survey or poll;
- to meet contractual obligations;
- to facilitate transactions;
- We may disclose your personal information in other circumstances where permitted or required by law or other legal process. For example, we may disclose your personal information: (a) to collect a debt owed to us; (b) as necessary to comply with a writ, warrant, court order or other legal process; (c) if disclosure is requested by an investigatory body, law enforcement official or governmental authority which has lawful authority to request the disclosure of the information in respect of an investigation or other legal process; or (d) if we have reasonable grounds to believe that the information relates to a breach of an agreement or contravention of a law, or to protect the personal safety of our users or defend our rights or property.

### 3.1 Information we share and receive through Third Parties

- On registration your email address, and internet protocol (IP) address, will be shared with an integrated Spam Defence software solution provided by Invision Power Board platform, which is managed by IPS Inc, this is a security feature to stop abuse of our system by determining the likelihood of a registering account being a spam source (see [Privacy Policy](#)).
- We use the hCaptcha anti-bot service (hereinafter "hCaptcha") on our website. This service is provided by Intuition Machines, Inc., a Delaware US Corporation ("IMI"). hCaptcha is used to check whether the data entered on our website (such as on a login page or contact form) has been entered by a human or by an automated program. To do this, hCaptcha analyses the behaviour of the website or mobile app visitor based on various characteristics. This analysis starts automatically as soon as the website or mobile app visitor enters a part of the website or app with hCaptcha enabled. For the analysis, hCaptcha evaluates various information (e.g. IP address, how long the visitor has been on the website or app, or mouse movements made by the user). The data collected during the analysis will be forwarded to IMI. hCaptcha analysis in the "invisible mode" may take place completely in the background. Website or app visitors are not advised that such an analysis is taking place if the user is not shown a challenge. Data processing is based on Art. 6(1)(f) of the GDPR (DSGVO): the website or mobile app operator has a legitimate interest in protecting its site from abusive automated crawling and spam. IMI acts as a "data processor" acting on behalf of its customers as defined under the GDPR, and a "service provider" for the purposes of the California Consumer Privacy Act (CCPA). For more information about hCaptcha and IMI's privacy policy and terms of use, please visit the following links: <https://www.hcaptcha.com/privacy> and <https://www.hcaptcha.com/terms>. ( see their [Privacy Policy](#))
- Any service, donation or goods which require payment to GMIC is processed through third party payment services. Services are currently provided by PayPal &

## GMIC Privacy (& Cookie) Policy February 2023

Stripe and include the ability to pay through Apple or Google Pay. GMIC will not record, retain or be responsible for any sensitive financial information or payment details provided to PayPal or Stripe. The data that is entered for payment is processed directly through the respective third party payment service, and accordingly is not directly or indirectly stored or logged on any GMIC servers.

- Other than for the purposes outlined within this policy, we do not sell or knowingly share your email address or other personal data to third parties.

### 4. How we store and protect personal information

The security of your information is important to us. While we have implemented safeguards to protect the information we collect, no website or internet transmission is completely secure, and we cannot and do not guarantee the security of your personal information. We urge you to take steps to keep your personal information safe, such as choosing a strong password and keeping it private, as well as logging out of your user account, and closing your web browser when you have finished using GMIC on a shared or unsecured device.

We maintain personal information on our servers (or those of our service providers). Your membership account is password protected. If you create an account on GMIC, you are responsible for maintaining the strict confidentiality of your account password, and you shall be responsible for any activity that occurs using your account credentials, whether or not you authorised such activity. Please notify us of any unauthorised use of your password or account or any other breach of security. In identified parts of our website, we use SSL-encryption in an effort to protect data transmissions. Our policy is to limit access to sensitive personal information to administrators only. Administrators cannot access or view password information that you have set, this set by yourself and encrypted on our system.

If you correspond with us by email, private messaging or using web forms like a “contact us” feature on GMIC, you should be aware that your transmission might not be secure or considered confidential. A third party could view the information you send in transit by such means or we could disclose the information you send in accordance with this Privacy Policy. We will have no liability for disclosure of your information, including due to errors or unauthorised acts of third parties during or after transmission.

Our volunteer staff and some of the third-parties to whom we disclose Personal Data (as set out above) may be located in countries outside of the European Economic Area (“EEA”), including in countries that may not provide the same level of data protection as your home country. We take appropriate steps to ensure that recipients of your Personal Data are bound to duties of confidentiality and, where required under law, we implement measures to ensure that any transferred Personal Data remains protected and secure.

## 5. Links to external content

GMIC hosts advertisements and links which may link or direct you to other websites, services or external content provided by third parties. We do not exercise any control over these third party websites or services. Members may also post content which includes imbedded images or videos that are located on third party websites or servers. We are not responsible for the privacy practices of such third party websites or services. We recommend that you read the privacy policy for any third party website that you visit or service that you use.

## 6. Children

GMIC is not a children's website and is not directed towards children. We do not knowingly request or collect personal information from children - persons under 13 years of age, or another age if required by applicable law - without prior verifiable parental consent. If we become aware that we have unknowingly collected personal information about a child without verifiable parental consent, we will delete this information from our records or, if that is not reasonable, we will take reasonable available steps to de-identify the information.

## 7. Accessing or correcting your personal information

We encourage you to keep your personal information accurate and up to date. If you have an account with us, you can access and correct certain of the information in your account or public user profile by logging in to your account or profile and making the necessary edits.

You may request access to or correction of your personal information in our custody or control by contacting us as set out below. We may take reasonable steps to authenticate your identity before providing you with access to your personal information or making corrections. Please also note that in some cases we may not be able to provide you with the personal information you have requested (for example, if the information is subject to solicitor-client privilege or contains personal information of others that cannot be severed).

### 7.1 Deletion of Membership

You may withdraw your consent to the continued processing of the personal data that you have supplied to us on this website at any time by contacting us by any of the means linked via our contact-us form which is accessible from the footer of any page.

If you withdraw your consent to us using the personal data that you have provided to us through this website, we will suppress such data from our databases. However, content which has been posted by an individual member may be retained if it does not feature any identifying personal data attributed to an individual's prior membership. If you

## GMIC Privacy (& Cookie) Policy February 2023

withdraw your consent to us processing your personal data we shall not be obliged to fulfil any outstanding request that you have made through this website.

We regularly review memberships accounts. If a membership account remains inactive for a period of 5 years, we will automatically delete the membership and remove identifiable data such as email and IP address logs from our system. Any content that has been posted during the period of membership will be retained.

Members who fail to validate their email account when requested to do so will automatically be suspended. (Members are required to validate their email is up to date every 12 months). Members who fail to update their email account 12 months after the request was initially made, will automatically have their membership deleted and any identifiable data such as email and IP address logs will be removed from our system. Any content that has been posted during the period of membership will be retained.

### 7.2 Access to your information

You have the right to access the information that we hold about you at any time. All data subject access requests should be made through contacting the site administrator or the online contact form.

## 8. Cookies & Tracking Technologies

GMIC website is powered primarily (but not exclusively) by software licensed by Invision Power Services, which uses cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many internet sites and servers use cookies. Many cookies contain a so called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific internet browser in which the cookie was stored. This allows visited internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific internet browser can be recognized, identified and authenticated using the unique cookie ID.

Through the use of cookies, GMIC can provide the users of this website with more user-friendly services that would not be possible without the use of cookies.

Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilise our website. A visitor that uses cookies does not have to enter access data each time the website is accessed and website preferences are retained for visitor convenience. We do not use first party cookies to collect personal data from which you can be identified as a named individual.



## GMIC Privacy (& Cookie) Policy February 2023

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject any cookies

### 8.1 Some of the Standard Cookies used by GMIC

**ips4\_IPSSessionFront** This cookie contains the ID of your current session.

**ips4\_member\_id** Your member ID. Used to identify if you are logged in.

**ips4\_loggedIn** This cookie is set after login, it is used by caching mechanisms to identify if you are logged in.

**ips4\_login\_key** A unique key to authenticate your member ID cookie. This cookie is set after you log in when you tick 'Remember Me' so you can be automatically logged in again in the future.

**ips4\_device\_key** This cookie is set after you log in when you tick 'Remember Me' so you can be automatically logged in again in the future. It is also used to improve account security.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the internet browser used, and may thus permanently deny the setting of cookies. Further, existing cookies may be deleted at any time via an Internet browser or other appropriate software; a function that exists in all major internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website will be entirely usable.

### 8.2 Other Cookies

During the course of interacting with our website, guests or members may click on advertising or links to third party websites or embedded social media such as YouTube, Facebook, Instagram etc. Clicking on or following such links from our pages may create cookies or tracking technologies relating to those third party websites. We are not responsible for cookies or tracking technologies relating to third party websites.

### 8.3 Tracking Technologies & Advertising

We take privacy seriously, at this time GMIC does not directly use tracking technologies and we actively try to identify and prevent the use of tracking technologies through our web pages. However the internet is a complex and evolving technology and sometimes such technology may embed itself on our system through the use of third party licensed

## GMIC Privacy (& Cookie) Policy February 2023

software, third party uploaded images or files without our awareness. Other than the collection of data or the sharing of data already declared within this privacy policy, we do not knowingly use tracking technologies for advertising or any other purpose. When leaving GMIC other websites may collect data from your browser which identifies that you have recently visited us, this is beyond our control.

Most modern web browsers provide the option to send a “do not track” signal to the websites you visit, indicating that you do not wish to be tracked. At this time, there is no generally accepted standard for how a website should respond to this signal, and we do not take any action in response to this signal.

## 9. User from the UK & EU(EEA)

### 9.1 Definitions

The data protection declaration of GMIC as summarised above in Parts 1 to 8 are based on the legislation set out under the UK Data Protection Act 2018 which for the purposes of GMIC compliance, also mirrors the requirements of the EU General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. The following section gives more detail to what is essentially set out in Sections 1 to 8 above:

In this data protection declaration, we use, inter alia, the following terms:

#### a) Personal data

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### b) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

#### c) Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## GMIC Privacy (& Cookie) Policy February 2023

### **d) Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

### **e) Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

### **f) Pseudonymization**

Pseudonymization is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data is not attributed to an identified or identifiable natural person.

### **g) Controller or controller responsible for the processing**

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing is determined by UK, Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

### **h) Processor**

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### **i) Recipient**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with UK, Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

### **j) Third party**

## GMIC Privacy (& Cookie) Policy February 2023

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, is authorized to process personal data.

### **k) Consent**

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

### **9.2 Name and Contact of the Controller**

Controller for the purposes of the UK Data Protection Act and EU General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Gentleman's Military Interest Club, United Kingdom

Email: [administrator@gmic.co.uk](mailto:administrator@gmic.co.uk)

Website: [www.gmic.co.uk](http://www.gmic.co.uk)

### **9.3 Collection of general data and information**

GMIC collects a series of general data and information when a data subject or automated system accesses the website. This general data and information is stored in the server log files. Collected information and data may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our systems and infrastructure.

When using this general data and information, GMIC does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website, (3) ensure the long-term viability of our systems and infrastructure and (4) provide law enforcement authorities with the information necessary for criminal prosecution in the event of a cyber-attack. Therefore, GMIC anonymously collects data and information statistically, with the aim of increasing the data protection and data security of our organization, and to ensure an optimal level of protection for the personal data we process. The anonymous data within relevant logs are stored separately from all personal data provided by a data subject.

### **9.4 Registration on our website**

## GMIC Privacy (& Cookie) Policy February 2023

The data subject has the ability to register on the website of the controller with the indication of personal data. What personal data is transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject is collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors or sub processors that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject, date, and time of the registration is also stored. The storage of this data takes place in the background and is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate misuse of our systems and services. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to transmit the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data is stored about the data subject. In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations. The entirety of the controller's employees are available to the data subject in this respect as contact persons.

### 9.5 Subscription to our email based newsletters

Members are given the opportunity to sign up and subscribe to email contact from GMIC Administration. GMIC occasionally informs its members of improvements, news or promotions in relation to the website.

GMIC news emails may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers to receive such emails. A confirmation e-mail will be sent to the e-mail address registered by a data subject, for legal reasons, as part of a double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

## **GMIC Privacy (& Cookie) Policy February 2023**

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties, unless such transfer is necessary exclusively for the processing and delivery of the newsletter to the data subject. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for delivery of the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller.

### **9.6. Contact possibility via the website**

Our website contains information that enables a quick electronic contact to our administrator, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject is automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller is stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties, unless necessary to deliver further correspondence.

### **9.7 Routine erasure and blocking of personal data**

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the UK Data Protection Act & European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the UK or European legislators or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements. If a statutory purpose for storing data no longer exists, all personal data and applicable purchase information is erased and purged from our system after a period of five (5) years.

### **9.8. Rights of the data subject**

#### **a) Right of confirmation**

Each data subject shall have the right granted by the UK & European legislators to obtain from the controller the confirmation as to whether or not personal data concerning him or her is being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact the controller.

## GMIC Privacy (& Cookie) Policy February 2023

### b) Right of access

Each data subject shall have the right granted by the UK & European legislators to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the UK & European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data is not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data is transferred to a third country or to an international organization. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact the controller.

### c) Right to rectification

Each data subject shall have the right granted by the UK & European legislators to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact the administrator.

### d) Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the UK & European legislators to obtain from the controller the erasure of personal data concerning him or her without undue

## GMIC Privacy (& Cookie) Policy February 2023

delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary (eg. in cases where a financial transaction has occurred):

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing;
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR;
- The personal data have been unlawfully processed;
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by GMIC, he or she may, at any time, contact the administrator who will ensure that the erasure request is complied with in accordance with applicable laws and regulations.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, the personal data, as far as processing is not required. An administrator will arrange the necessary measures on an individual basis.

### **e) Right of restriction of processing**

Each data subject shall have the right granted by the UK & European legislators to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead;
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.



## GMIC Privacy (& Cookie) Policy February 2023

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by GMIC, he or she may at any time contact the controller.

### **f) Right to data portability**

Each data subject shall have the right granted by the UK & European legislators, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others. In order to assert the right to data portability, the data subject may at any time contact the administrator at GMIC.

### **g) Right to object**

Each data subject shall have the right granted by the UK & European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR.

This also applies to profiling based on these provisions. GMIC shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If GMIC processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to GMIC to the processing for direct marketing purposes, GMIC will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by GMIC for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

## GMIC Privacy (& Cookie) Policy February 2023

In order to exercise the right to object, the data subject may contact an administrator. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

### **h) Automated individual decision-making, including profiling**

Each data subject shall have the right granted by the UK & European legislators not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by UK, Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, GMIC shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact an administrator.

### **i) Right to withdraw data protection consent**

Each data subject shall have the right granted by the UK & European legislators to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact GMIC.

## **9.9. Legal basis for the processing**

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations is necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which is necessary for carrying out pre-contractual measures such as inquiries concerning our products or services. If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the

## **GMIC Privacy (& Cookie) Policy February 2023**

vital interests of the data subject or of another natural person. The processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which is not covered by any of the aforementioned legal basis, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

### **9.10. The legitimate interests pursued by the controller or by a third party**

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favour of the well-being of all our members.

### **9.11 Period for which the personal data will be stored**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

## **10. Changes to our Privacy Policy**

You should note that we may change this privacy policy without notice. Please check back frequently to see any updates or changes made to this statement.

## **11. How to Contact Us**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the site administrator through the email contact form.