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From GDC Coop

1. Important notice.

This is the Privacy Policy for <http://www.gdc.coop> It describes who we are, how we obtain and use the personal data of representatives of our business customers, why we are allowed to do so by law, who has access to your personal data and what your rights are. Please review it carefully. You have the right to object to us processing your personal data for our legitimate business interests or for direct marketing purposes (including any related profiling). For more information about your rights and how you can exercise them, please see the section Your rights.

2. About us.

We are a Cooperative Association registered in the State of Minnesota, USA with a Registered Office at 9800 Shelard Parkway, Plymouth, MN 55441,USA.

We take your privacy seriously will be further explained in this Privacy Policy Statement.

3.

We collect personal data which is any information that identifies you personally either directly (for example, your name) or indirectly (for example, information about your use of our services).

We collect the following personal data from you:

- **Basic contact details:** We collect your name, email address, postal address and telephone number so that we can contact you about your doubts over our services.
- **Correspondence:** We collect any additional personal data that you may provide to us from time to time if you contact us by email or telephone, through our website or by any other means. If you contact us by telephone, we may also record the call and make notes in relation to your call, to comply with our legal obligations and to be able to deal with any dispute or

defense of a claim which may arise in the course of us providing our products and services to you. We also obtain information about you from other sources:

- **Cookies and similar technologies:** We track your use of our website through cookies and other similar technologies so that we can provide important features and functionality on our website, monitor its usage, and provide you with a more personalized experience. Please see our Cookies policy to find out more.
- **Third parties:** We obtain personal data about you from third parties where you have given that third party consent to share such information with us.

4. How we use your personal data

We use your personal data for the following purposes: To send you our service communications, including in relation to changes to our terms.

We use the contact details you have provided to us so that we can communicate with you about the products and services that we provide, including to let you know about any changes to our terms and conditions.

To confirm your identity and verify the information you provide.

For security reasons and to safeguard the authenticity of our clients, we must confirm you are who you say you are. This means we may check the information you provide to us against other information we hold about you from the third-party sources described above in What personal data we collect and why.

Direct marketing (including by third parties) If you have provided your consent or we otherwise have the right to do so, we may use your contact details to send you direct marketing and keep you informed of promotional offers by email, or telephone relating to our products and services. You can unsubscribe from our direct marketing at any time by clicking the “Unsubscribe” link in any of our emails or by contacting us (see How you can contact us). To conduct automated decision-making and profiling.

We use technology which tracks your use of our website, products and services to help us build a profile of your preferences. What this means for you is that you are more likely to receive direct marketing and promotional offers that are tailored to your specific preferences, based on your previous activity. It also means that we don't send the same offers to all of our customers, so you may not be made the same offers as another customer. If you don't agree with an automated decision that our technology has made in relation to you, you can let us know (see How you can contact us) and we may decide to look into it for you. You may still have the right to object to us processing your personal data for the purpose of automated decision-making or to restrict us from doing so (see Your rights).

Please note that the legal basis for us carrying out these activities is that it is in our legitimate interests to do so, having taken into account whether your interests and fundamental rights and freedoms are overridden by this type of processing. See Legal grounds for processing for more information. To track your usage of our website, communications, products and services.

We use cookies and similar technologies to track your activity on our website so that we can provide important features and functionality on our website, monitor its usage, and provide you with a more personalized experienced. Please see our Cookies policy to find out more.

We also use tracking technology within our emails to capture information such as the time and date you open our emails and the type of device used to open it. We use this information to understand the effectiveness of our email communications so that we can improve them in the future and provide a more personalized overall service to you.

We combine the personal data we hold about you with other customers' personal data to produce underwriting risk analysis reports for our commercial lenders and commercial insurers. The reports we produce are based on combined, aggregated datasets and do not contain any personal data about you or about any of our other customers.

We use the telephone number you have provided to us so that we can call you to discuss the renewal of the contract between us for any paid-for products and services we provide.

To provide and improve customer support. We use your personal data to be able to provide and improve the customer support we provide to you (for example, where you have questions about our products and services).

To conduct internal training. We may use your personal data for internal training purposes so that our staff have the knowledge and expertise they need to ensure we provide you with the best possible customer experience.

For example, if you contact us by telephone, we may record the call and make notes in relation to your call for training and service improvement purposes. To conduct market research and analytics.

We may analyze your personal data (potentially in combination with personal data relating to other customers) to better understand our customer base. We may also invite certain customers to be involved in market research. If you accept our invitation, we will use your feedback to improve our products and services. To maintain our records and improve data accuracy. Like any business, we process personal data in the course of maintaining and administering our internal records. This includes processing your personal data to ensure that the information we hold about you is kept up to date and accurate. To respond to enquiries, complaints and disputes.

We use the personal data we hold about you to help us respond to any enquiries or complaints you have made, or deal with any dispute which may arise in the course of us providing our products and services to you, in the most effective manner. To investigate, detect and prevent fraud and comply with our legal obligations. In certain circumstances, we use your personal data only to the extent required in order to enable us to comply with our legal obligations, including for fraud detection, investigation and prevention purposes. This may require us to provide your personal data to law enforcement agencies, including Trading Standards, if they request it.

5. Legal grounds for processing

Data protection law requires us to only process your personal data if we satisfy one or more legal grounds. These are set out in data protection law and we rely on a number of different grounds for the processing we carry out. These are as follows: Consent In certain circumstances, we process your personal data after obtaining your consent to do so for the purposes of:

- sending you marketing communications about our products and services;
- sharing your name, email address, postal address and telephone number with our trusted business partners so that they may market to you about their own similar products and services;
- conducting marketing research;
- confirm your identity and verify the information you provide;
- provide and improve customer support.

Necessary for the purposes of our legitimate business interests or those of a third party. It is sometimes necessary to collect and use your personal data for the purposes of our legitimate interests as a business, which are to:

- better understand our customer base so that we can improve our products and services and marketing activities (which could also benefit you);
- comply with our contractual obligations to third parties, for example to produce aggregated underwriting risk analysis reports for our commercial lenders and commercial insurers;
- train our staff so that we can provide you with a better customer service;
- respond to any enquiries or complaints you have made, or deal with any dispute which may arise in the course of us providing our products and services to you.
- ensure effective operational management and internal administration of our business, document retention, compliance with regulatory guidance and exercise or defense of legal claims.

Please note that where we wish to rely on this legal ground for processing, we are required by data protection law to consider whether our legitimate interests are overridden by your interests or your fundamental rights and freedoms.

We may continue to process your personal data on the basis of our legitimate interests only if we determine that your interests, rights and freedoms are not overridden by our legitimate interests. We have considered these matters and on balance, we consider that the benefits described above are not outweighed by your interests or your fundamental rights and freedoms. Where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected we will not process your personal data unless there is another legal ground for us to do so (either that we have obtained your consent to the processing or it is necessary for us to perform our contract with you or to comply with our legal obligations).

6. Who we share your personal data with and where it is stored by them

We may provide your personal data to:

- Our suppliers and services providers, including other companies in our group, who perform certain business services for us and act as “processors” of your personal data on our behalf;
- Other organizations, who use your personal data for their own purposes and are “controllers” of such data in their own right. In addition, we may disclose your personal data:
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to protect the rights, property or safety of our business, our customers or others. This includes, in specific cases, exchanging information with other organizations for the purposes of fraud protection; and to successors in title or replacement operators of all or part of our business.

7. How long we keep your personal data for:

We retain your personal data for no longer than is necessary for the purpose(s) for which it was provided. What this means in practice will vary between different types of data. When determining the relevant retention periods, we take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law;
- potential or actual disputes; and
- guidelines issued by relevant data protection authorities. Otherwise, we securely erase your personal data from our systems when it is no longer needed.