

Gambit Nash Limited

Website Privacy Policy

Revised: 18/05/2018

1 Preamble

This privacy policy defines how Gambit Nash Limited collect, utilise, and protect information gathered about you, your system, and your visit to our website. This includes but is not limited to information stored in Cookies, Analytical Data, and data which submitted via forms on the site.

Gambit Nash Limited is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

Gambit Nash Limited reserve the right to update and amend this Privacy Policy as we see fit without prior notice. The most recent copy of the policy will be made available via the Gambit Nash website.

2 Data Collection and Use

2.1 What we collect

Gambit Nash Limited aim to collect as little information as possible required to run the site and associated services. Some additional data may be stored in order to personalise your experience.

2.1.1 Anonymised Analytical Data

By default, we utilise mainly first-party set by third-party services to gather analytical data about your visit to the website. You consent to the use of these cookies and the data which they gather through your continued use of the website.

Analytical cookies are related to Google Analytics ("GA") and Automattic Jetpack ("Jetpack") services. The data that is collected is anonymised and tells us the following information:

- The web pages you have visited on our site
- Search queries entered into the website's search feature
- Information about your web browser, including version, screen size, and operating system

This information is utilised internally to improve our website and services based on usage patterns and visitor behavior, and enables us to continually deliver the best experience possible by prioritising information that visitors look for most frequently, whilst ensuring we support the browsers and systems that our visitors use most.

Google Analytics and Jetpack may also collect Internet Protocol (IP) addresses to provide and protect the security of their respective services, and to give website owners a sense of which country, state, or city in the world their users come from (also known as "IP geolocation").

In addition to the above analytical data, we also use a third-party to analyse traffic to the site for potential business leads. The third party, "A1WebStats", utilises technology to identify company names based on IP address information, but it does not identify individual people. A1WebStats provide only company names linked to an IP address, and so there is no personal data available within their system.

The following links are provided as resources to further understand the privacy policies of the third-parties which we utilise:

- Google Privacy Policy - <https://policies.google.com/privacy>
- Automattic Privacy Policy - <https://automattic.com/privacy/>
- A1WebStats Privacy Policy - <https://www.a1webstats.com/privacy-policy/>

These third-parties all act as data processors on our behalf.

2.1.2 Personally-Identifiable Data

We collect personally-identifiable information whenever it is willfully entered into one of our web forms and submitted to us. No personally-identifiable information is collected by default in any other area of the website.

When you utilise forms on the site (with the exception of the site search form, as described in section 2.1.1), data you enter into the fields is sent back to our servers, stored in our database, and in some cases emailed to relevant members of our team.

This information may include but is not limited to:

- Full Name
- Job Title
- Company
- Contact Information, such as Phone Number(s) and Email Address(es)
- Physical Address(es) (which may be used for billing and/or shipping purposes)
- Demographic Information such as Country, Postcode, Age, Preferences, and Interests
- Newsletter Consent

The information collected in this manor varies by form, and is clearly labeled as to the data which should be entered. No data of this nature can be collected without your consent (by inputting the data into the form) and it is not linked in any way to the Anonymised data (as described in section 2.1.1)

We ensure that no single form collects any more information than is necessary. For example, Job application forms may collect more information in order for us to assess a potential candidate, whereas Contact forms may collect only a name, phone, email, and message.

If you are under 16 years of age you MUST obtain parental consent before entering information and submitting any form on our website. By submitting your information you acknowledge that you have parental consent to do so.

If you live in the United States ("U.S.") and are under 13 years of age, you may not join our mailing list as per the Federal Trade Commission's "COPPA" rules, as defined in USC Title 15, Chapter 91, §6501

2.1.3 Email Newsletter

At your explicit consent, we may add you to our email marketing newsletter list. This is an opt-in service, where you have supplied us with your name, email address and “Opt In” consent (usually displayed as a checkbox). We store this information, along with the time and date of your consent with a third-party whom we utilise to manage our email newsletter.

The third-party, “MailChimp”, act as a data processor on our behalf and store data inline with their privacy policy which can be found at the following address:

- MailChimp Privacy Policy - <https://mailchimp.com/legal/privacy/>

If you are under 16 years of age you MUST obtain parental consent before joining our email newsletter. By submitting your details to join our mailing list you acknowledge that you have parental consent to do so.

If you live in the United States (“U.S.”) and are under 13 years of age, you may not join our mailing list as per the Federal Trade Commission’s “COPPA” rules, as defined in USC Title 15, Chapter 91, §6501

3 Data Protection

Gambit Nash Limited are committed to the protection of your data, and we take every appropriate measure to ensure the security and integrity of the data we process and store.

All data transmitted to and from our website(s) is encrypted using TLS (versions 1.2 or 1.3) using strong cryptographic ciphers. This ensures data is secure in-transit, and can be verified by checking that you are using the site over HTTPS (a small padlock, green text, and the prefix "https://" in your browser's address bar indicate this).

4 Data Processors

Gambit Nash Limited use the following third-parties which act as data processors in relation to the Gambit Nash website and online services offered by the company:

- Google
- Automattic
- NewRelic
- OVH
- Cloudflare
- Papertrail

These third-parties have been carefully chosen, and have publicly available privacy and/or data protection policies available to view online.

5 Data Controller

Gambit Nash Limited are the data controller of this website. Whose registered address is:

Gambit Nash Limited
Nash Works
Nash Court
Belbroughton
Stourbridge
DY9 9TD
England

Registered in England and Wales: No. 7077994
DUNS Number: 216348606

5.1 Data Protection Officer

Gambit Nash Limited are not required to appoint a data protection officer nor to register with the Information Commissioners Office ("ICO").

In order to simplify internal processes and ensure compliance with regulations such as EU Article 28 ("GDPR") Gambit Nash Limited have voluntarily opted to appoint the the following member of staff as the Data Protection Officer ("DPO"):

Mr. Daniel Wilson
Tel: +44 (0) 156 273 1313

6 Data Breaches

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

7 Rights of the Individual

The data subject also has the following rights as per EU Article 28 ("GDPR"). These consist of:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Each of these rights are supported by appropriate procedures put in place at Gambit Nash Limited. For all data subject requests (such as a request to be forgotten), please contact the Data Protection Officer as documented in section 5.1.

The timescales Gambit Nash Limited aim to achieve for data subject-related requests are shown in Table 1.

Data Subject Request	Timescale
The right to be informed	Within one month
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

Table 1 - Timescales for data subject requests