

FrontierResolve GPR Privacy Policy

1 DEFINITIONS

'We', 'Us', 'Our(s)', and 'FrontierResolve GPR' mean FrontierResolve GPR Limited, a company registered in England & Wales with registration number 17167157 and whose registered office is at Brookfield Court, Selby Road, Garforth, Leeds, West Yorkshire, United Kingdom, LS25 1NB (the 'Company'), who is responsible for Our website.

'You', 'Your(s)' means a natural or legal person, public authority, agency or other body with whom FrontierResolve GPR has entered into a contractual agreement to deliver Our business services, or a natural or legal person, public authority, agency or other body that has visited Our website and / or submitted an enquiry through Our website.

'Controller' means, according to the UK GDPR, 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.

'Processor' means, according to the UK GDPR, a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

'Personal Data' means, according to the UK GDPR, 'any information relating to an identified or identifiable natural person ("data subject")'.

'Cookie' means a small text file placed on Your computer or device by Our site when You visit certain parts of Our site and/or when You use certain features of Our site.

2 OVERVIEW

FrontierResolve GPR understands that Your privacy is important to You. This Privacy Policy is issued by FrontierResolve GPR. Please read this Privacy Policy carefully and ensure that You understand it.

2.1 PURPOSE

This Privacy Policy sets out the basis on which We collect, process and retain the following types of data relating to identified or identifiable individuals ('Personal Data'):

- All personal data provided to Us in connection with Our contractual relationship with a client or prospective client ('Client Data');
- All data that is provided to Us while providing business services ('Business Data'); and
- All personal data provided to Us through Our website ('Website Data').

FrontierResolve GPR is committed to protecting and respecting Your privacy. We comply with the applicable data privacy and security requirements in the countries in which we operate.

We respect the privacy of everyone who visits www.frontioerresolvegpr.com ('Our website') and will only collect and use personal data in ways that are described by this policy.

2.2 SCOPE

Your acceptance of Our Privacy Policy is deemed to occur upon Your first interaction with Our website. You will be required to read and accept this Privacy Policy when signing a contract with Us. If You do not accept and agree with this Privacy Policy, You must stop accessing Our website immediately.

2.3 POLICY OWNERSHIP & GOVERNANCE

We are not required to appoint a data protection officer. However, the responsibilities of such an officer have been assumed by our CEO. These responsibilities include:

- Approval of this policy and appropriate procedures;
- Handling reported data breaches;
- Informing the Information Commissioner's Office (ICO) when necessary; and
- Responding to data subject request to access the data we hold on them and correcting it where necessary.

This policy is reviewed as needed as a result of changes in Our business services or in the system and processes used to deliver them, or due to changes in the relevant laws and regulations.

3 WHAT WE COLLECT AND HOW WE USE THE DATA

Depending on the nature of the client engagement, the source of the Personal Data, and the extent of control and decision-making we have in respect of the personal data we act as a controller. We will not act as a processor while discharging Our business services to You.

3.1 CLIENT DATA (PERSONAL DATA)

Client data include the following personal data:

1. Full name and job title;
2. Contact details, including e-mail address, phone number, and company name.

Additional data about You we may also collect and process includes the following:

1. Record of Your request to contact Us and any correspondence thereof;
2. Record of Your preferences;
3. Record of Your visits to Our website.

When we are providing a service to You subject to contractual agreement, the collection of certain data could be a requirement for providing the services You requested.

While You are under no obligation to provide Us with personal data, this may result in Us not being able to provide the requested services.

We may use the personal data You have provided to Us to:

- Market Our services in which You have expressed an interest or for which we obtained specific consent;

- Conduct legitimate internal research, training or for statistical purposes;
- For record-keeping purposes and in compliance with applicable laws and regulations.

4 BUSINESS DATA

Business data covers the data that You are providing to Us as part of FrontierResolve GPR's provision of business services to You, subject to any contractual agreements. Business Data may include Personal Data provided to us regarding Your clients.

Collecting information on individuals may be required for the purpose of Us delivering a business service to You.

You may provide Us with personal data as Our client; alternatively, We may collect personal data from public records as well as from enquiries with persons known to Us or other legitimate sources.

We provide a number of business services to Our clients that may include geopolitical risk assessment and deep-dive reports on persons and entities of interest. While providing these services, it may be necessary for Us to collect and analyse information on individuals; in these cases, the information collected may be provided to Us by Our clients, may be collected by Us from public domain specialist databases, or may be obtained or purchased via third-party business partners and service providers and other sources.

In all these cases, the business information we may collect and analyse could include:

- Contact information, including names, job titles, addresses, phone numbers, e-mail addresses, and business contact information;
- Legal identity information including passport, driving licence, and other forms of identification;
- Detailed business information, including company profiles, management structure included in private domains and legitimate sources, details of company officers and relevant employees, extended company ownership and details of key connected companies and controllers;
- Relevant information to support the creation of an accurate risk profile, including media and public reports of offences, suspicion and link with relevant persons and entities (including Politically Exposed Persons);
- Other background information from publicly available sources and other legitimate sources and third parties that are relevant to understand the geopolitical risk profile of Our clients or of persons or entities of interest, including criminal records, affiliation or association to political structures.

This business data is used to meet Our contractual obligation to Our clients. This may include creating risk profiles, conducting trend analysis and predictive forecasting, and providing deep-dive reports on persons and entities of interest. The use of this business data is subject to the provision of Our business services and to the nature of the contractual arrangements in place with Our clients.

The UK GDPR Article 6(1b)¹ provides the legal basis for Us to collect and use business data, including client personal data, as part of the delivery of Our contractually agreed business services.

Where it is necessary to collect information concerning political opinions or affiliation for the provision of Our contractually agreed business services to Our clients, the collection and use of this data shall only apply in accordance to UK GDPR Article 9(2a)² or Article 9(2e)³. We prioritise the protection of individuals and persons that cannot provide consent due to limited physical and legal capability. We also consider the processing of certain personal data in the context of relevant public interest.

5 WEBSITE DATA

Depending upon Your use of Our site, we may collect some or all of the following personal and non-personal data (please also see Our Cookie Policy in Section 4 on Our use of cookies and similar technologies):

- Name;
- Business / company name;
- Profession;
- Contact information such as email addresses and telephone numbers;
- Demographic information such as postcode, preferences, and interest;
- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, Your activity on Our website, and the site You exit to;
- Property address;
- Any documents You submit to Us (such as CVs)

We use the data collected through Our website for legitimate interest, including:

- Ensuring the content from Our website of interest is displayed correctly and accurately on Your device(s);
- Support improvements of Our website functionality;
- Support effective response to Your requests;
- Prevent unlawful activities including fraud and misrepresentation.

We do not share the data provided to Us through Our website with any third parties unless prior consent is obtained for legitimate reasons.

You may choose at any time to send a written request to Us to remove all Your personal data that is captured on Our system from accessing and interfacing with Our Website, and We will reply to Your request once the removal of relevant data is confirmed. For reference also see the [Cookies Policy](#) in Section 4 of this document.

¹ 'processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract'

² 'the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject'

³ 'processing relates to personal data which are manifestly made public by the data subject'

6 YOUR RIGHTS

Under this Policy, We uphold the following rights under the GDPR:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about You;
- The right to request and execute rectification if any personal data We hold about You is inaccurate or incomplete;
- The right to ask Us to delete any personal data We hold about You (We only hold Your personal data for a limited time as permitted or requested by the applicable legislation);
- The right to restrict the processing of Your personal data;
- The right to obtain a copy of Your personal data;
- The right to restrict the processing of Your personal data; and
- The right to request restriction for the use of Your personal data for particular purposes.

6.1 RIGHT TO WITHHOLD INFORMATION

You may access certain areas of Our website without providing any data to Us. However, to use all features and functions available on Our site, You may be required to submit or allow for the collection of certain data.

6.2 COMPLAINTS

If You consider that Our processing of Your personal data breaches any of Your rights under applicable data protection laws, You have the right to refer Your complaint to the relevant supervisory authority, including the UK Information Commissioner's Office (ICO).

7 COOKIES POLICY

Our site may place and access certain cookies on Your computer or device.

This may include 'strictly necessary cookies' that enables basic functionality of Our website, 'functional cookies' that allow Our website to remember the user input information that would change the way it behaves or looks, 'performance cookies' that help Us understand how the visitors interact with Our website by collecting and reporting information anonymously and to increase Our website performance and 'targeting cookies' used to track Our website visitors for marketing purposes.

You can block cookies or change Your settings at any time, using Your browser's cookie settings. However, this may mean that You are unable to use some or all of the content on Our website. By using Our website, We assume You accept all cookies that are in place.

8 HOW AND WHERE DO WE STORE YOUR DATA?

We only keep Your personal data for as long as We need to in order to use it and/or for as long as We have Your permission to keep it or are otherwise permitted by applicable laws and regulations.

Data security is very important to us. We have put in place appropriate security measures to protect Your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. This includes maintaining required procedures to deal with any suspected personal data breach, as part of which We will notify You and all relevant regulators where We are legally required to do so.

9 CONTACT

Any request for information on how We use Your data and questions related to this Policy should be sent to ["enquiries@frontierresolvegpr.com"](mailto:enquiries@frontierresolvegpr.com).