

PRIVACY POLICY

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☐ Purpose of this Privacy Policy

At GWR Consulting, we highly value the relationship we have with our clients and shoppers; therefore, we strive to remain transparent.

Please read our privacy policy below to understand how we collect, use and store your personal information. This policy sets forth the expected behaviours of GWR Consulting employees, with regards to the collection and processing of any personal data.

This policy and regular updates we bring to our procedures allow us to remain in line with the General Data Protection Regulation ([GDPR](#)). While most of the changes will only affect residents of the European Economic Area, we encourage all our clients and shoppers to review the new policies and become familiar with them.

☐ Scope

This policy applies to:

- Current clients who are granted access to <https://qualitycontrol.gwrconsulting.com> to receive our services

- Independent Contractor¹ who sign up to provide mystery shopping; schedule visits and/or validating reports via our online platform <https://qualitycontrol.gwrconsulting.com>;

For Clients:

• What Information we collect?

GWR Consulting use the contact name you provide, business telephone number and company email address to be able to provide you with our services.

We treat all information held about clients and client projects as highly confidential; this is supported by our confidentiality agreements.

Where data on client's employees is used in our reports, this is done with the consent of our client's on behalf of their employees. We restrict the number of people who have access to client data to a bare minimum, and clients set their own passwords. The only details that are shared with our mystery shoppers are project briefs, questionnaires and locations for set assignments and staff member names, schedules and location for the targeted mystery shopping visits; this is only shared with the carefully selected shopper for each visit.

• Purpose of Use of Personal Information

Your personal data is collected and stored on our online platform <https://qualitycontrol.gwrconsulting.com>; and we will use these information to execute duties including:

- Managing your projects; carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- Providing reports and analysis.
- Notifying you about changes to our service and announcements of new or updated services or features, if any.
- Informing you about our new services, events and training calendar
- Supplying you with useful references, news and articles for your business

• Who has access to your data?

Your profile is available to GWR Consulting employees with a legitimate business need. Access is granted on a least-privileged basis. Your profile data is securely stored and organized according to The General Data Protection Regulation (GDPR) on our online platform.

¹ **Independent Contractors:** Mystery Shoppers, Schedulers and Validators

- **How long we will keep your details?**

The amount of time we hold your Personal Data will vary but shall be kept for no longer than is necessary for the purposes for which it is being processed. We will retain your Personal Data indefinitely according to the contract. Furthermore, we will retain some restricted Personal Data in order to respond to any requests, support or defend any claims, and provide evidence of financial transactions in accordance with statutory or legal/financial retention periods.

- **For Independent Contractors**

- **What Information we collect?**

When signing-up as a mystery shopper with GWR Consulting, you are consenting to us collecting and processing your personal information, like first and last name, address, gender, e-mail address, phone number and date of birth. Following the registration, you will be issued with a username (or 'Shopper ID') and you will have opportunity to provide us with additional information on your lifestyle habits which will help us matching your profile and interests to suitable mystery shopping visits.

In order to receive your payment, you will also have to enter a financial information including but not limited to Bank account number in IBAN format and/or Swift code. It is strictly forbidden to indicate your Bankcard number. It will be erased right after detecting. If you contact us by mail, email, web or phone, we may keep a record of that correspondence.

We do not request or require you to provide any special categories of Personal Data including for example genetic data, biometric information for the purpose of uniquely identifying a natural person, or information relating to your political opinions, religious beliefs, trade union membership, physical or mental health, or sexual orientation. If we become aware of any such data having been submitted to us, we will, where reasonably practicable, endeavor to delete it.

We are fully committed to protecting your personal data and using it responsibly. Therefore, we treat all information we hold as highly confidential and private, and this information is not shared with any other party and not even with our clients unless you specifically consented to do so.

- **Purpose of Use of Personal Information**

Your personal data is collected and stored on our online platform <https://qualitycontrol.gwrconsulting.com>; and we will use these information to carry out assignments including:

- Providing you with information about new shopping opportunities, new training invitations, new features on our software and other services. You can switch off the automatic notification services in your Personal Profile through the site <https://qualitycontrol.gwrconsulting.com>, in the "Notifications" tab.
- Contacting you by phone or email regarding a query we have about the work you are doing for us, about a referral needed and providing you with your performance results.
- Reviewing information given about an assignment (such as verifying locations, times, visit specifications, etc.)
- Informing you about updates on projects, policies and instructions, etc.
- Responding to and fulfilling any requests you make to us.
- Requesting periodically that you update your details on our system, or confirm that the information we have for you is still valid.
- Collecting and maintaining historical information about your mystery shopping assignments and payments;

- **Who has access to you data?**

Your profile is available to GWR Consulting employees with a legitimate business need. Access is granted on a least-privileged basis. Your profile data is securely stored and organized according to The General Data Protection Regulation (GDPR) on our online platform

Your banking information (account number in IBAN format and or Swift code) are provided to our bank and money transfer agencies for the purposes of making payments.

- **How long we will keep your details**

The amount of time we hold your Personal Data will vary but shall be kept for no longer than is necessary for the purposes for which it is being processed.

For active shoppers, GWR Consulting will hold your Personal Data indefinitely until you request for it to be removed.

When you stop completing mystery shopping assignments, we will retain some restricted Personal Data in order to respond to any requests, support or defend any claims, and

provide evidence of financial transactions in accordance with statutory or legal/financial retention periods.

How personal data is protected

To protect your online privacy, we agree to the following:

- Users can visit our site anonymously.
- Users are able to change their personal information by logging into their account via <https://qualitycontrol.gwrconsulting.com/login.asp> and do not share their login credentials with other people.

We do not knowingly collect information from anyone under the age of majority. The sites are directed at people who are at least the age of majority where they live. If you believe your child has provided us with information, please contact us by email at dpo@gwrconsulting.com.

If we learn that we have collected data from an individual aged under 16, we reserve the right to delete such data without any prior notification or consent.

How you can access and control your personal data

GWR Consulting is committed to ensuring that you can exercise your right of access and control over your personal data. If you have registered for an account on www.gwrconsulting.com, you may directly access your online profile by logging in to your account so you can view or correct the data when necessary.

In addition, under the EU GDPR, you have the right to delete your data or restrict us from using them and to ask us to move your personal details to a new provider should you wish to port your personal data. Therefore, GWR Consulting will always provide you in every email, where relevant, with an unsubscribe link. Moreover, should you wish to use any of these rights please contact dpo@gwrconsulting.com where our team tasked with data protection and privacy can address any concerns or requests you may have in a timely manner.

In the event where you wish to withdraw your registration from our website your data will be immediately disabled and removed from the system within 90 days.

☐ Commitment to data security

Your personally identifiable information is kept secure. Only authorized employees, and service providers (who have agreed to keep information secure and confidential) have access to this information and we take suitable measures to ensure the confidentiality, integrity and availability of processes.

Our shoppers' data at GWR Consulting is held on our online platform. Our platform service provider is an EU-based partner and complies to the Privacy Shield Principles of the EU-U.S. Privacy Shield Framework and the Swiss-U.S which helps ensure that GDPR standards are met.

☐ For Inquiries

If you have any questions, concerns, requests or comments about our privacy policy you may email us at dpo@gwrconsulting.com