

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

For a resident of the EU/EEA, you are considered a Data Subject under the General Data Protection Regulation (GDPR). As such, you are entitled to certain disclosures about how your personal data is processed. You are also eligible for certain rights with respect to your personal data.

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.

Disclosures:

o **Basis for the processing**

We collect and process your personal data to be able to provide you with the services you have requested in your contract with us. We will only process your personal data in a manner that is lawful, fair and transparent. We will only collect personal data for specific purposes relative to providing you services, and we will not process personal data in a manner that is incompatible with those purposes. We will limit the personal data we collect to information that is necessary and relevant and limited to the purpose for which it is needed, such as mystery shopping opportunities, or various audit services we may provide, to our clients. We will give you the ability to ensure that the information is accurate and kept up-to-date. We will give you the right to change it, or erase it, without undue delay. We keep the personal data no longer than needed for the purpose for which we collect it, except for archive purposes. We process it in a manner that ensures appropriate security of your personal data, including protection against unauthorized unlawful processing, accidental loss, destruction, or damage. We will only process the personal data that you provide to us in connection with providing the services to you, or where necessary, where you have given specific consent, or in connection with legal obligations or our legitimate business interests.

o **Purpose of processing**

We process the personal data you give us in order to provide our services to you, such as providing you opportunities for mystery shopping or audit services, pursuant to your agreement.

o **Recipients or categories of recipients of the personal data**

Our internal staff will access the personal data you provide for the purposes of providing our services to you, and other internal or administrative business reasons.

We may disclose personal data about you to companies for whom you perform mystery shops, audits, or other service opportunities.

We may engage data processors to help provide data processing services in conjunction with providing our services to you or our clients. This includes systems, backups, and archives, which could be off-site.

We may also transfer your personal data to governmental authorities if required by law.

- **Required / optional personal data**

Certain personal data we may ask for, such as your name and birthdate, are necessary for us to provide you with our services, and your bank account information to process your payment. Certain other personal data we may ask for, such as your GPS location information, is optional (Please refer to section Use of Personal Information). However, if you elect not to provide the optional personal data, our ability to offer you service opportunities may be limited.

- **Period for which personal data will be stored**

We will retain your personal data for as long as necessary for the purposes for which it is being processed or to continue providing you with the services requested, including R&D, and for archiving, and legal compliance purposes.

For our independent contractors (Mystery Shoppers), we will retain your Personal Data indefinitely whilst you are actively completing mystery shopping assignments for us unless you request for it to be removed. When you stop completing mystery shopping assignments, we will hold your data for a period of 10 years (unless you request for it to be removed) and then 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

Your Rights:

As an EU resident the GDPR provides you with the following rights. This online system is designed with your data privacy rights in mind and gives you an easy way to exercise these rights. Your online profile may be edited by you, and there is a **Privacy Dashboard** for EU citizens shoppers which allows you to perform additional actions to help ensure protection of your privacy. You can also submit privacy-related requests directly to us.

Your specific rights under the GDPR include:

- **Right to request access**

You have the right to access and review your personal data.

- **Right to rectification**

You have the right to correct or change the personal data you provide us.

o **Right to erasure (“Right to be forgotten”)**

You have the right to request that the personal data you provided us be erased.

o **Right to data portability**

You also have the right to obtain a copy of the personal data that you provided to us in a machine-readable format.

o **Right to withdraw consent**

Where we have obtained specific consents from you, you have the right to withdraw those consents.

o **Right to restrict processing**

You have the right to restrict how we are processing your personal data.

o **Right to object**

You have the right to object to how we are processing your personal data.

o **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with a supervisory authority, available at:

http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

o **Automatic Profiling**

You have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal or other significant effects for you.

o **Breach notification**

If a personal data breach occurs and is likely to result in a high risk to your rights and freedoms, we will notify you and the appropriate supervisory authority in a timely fashion.

Use of Personal Information:

In the table below, and for maximum clarity and transparency towards all our users, we summarize the use of our Become a Mystery Shopper site for your personal information .

What?	Why ? - Main aims -	Who has access to this data? - Addressees -
Profile Information - Form to fill out during registration - and accessible / editable from the "My Profile" page		
Email-address	<ul style="list-style-type: none"> • Sign in to your account Become a Mystery Shopper • Sending invitations to participate in mystery shopping visits, and information related to the job (eg. important updates) 	<ul style="list-style-type: none"> • You • GWR Consulting Team

The password	<ul style="list-style-type: none"> • Create and connect securely to your account Become a Mystery Shopper 	<u>Only you</u>
Ethnicity / Gender / Nationality	<ul style="list-style-type: none"> • For some visits: <ul style="list-style-type: none"> ○ pre-targeting of participants by gender (male / female) or by ethnicity (caucasian, middle eastern, asian etc.) or by nationality ○ analysis of surveys responses by gender, ethnicity or nationality 	<ul style="list-style-type: none"> • You • GWR Consulting Team • Our customers, for statistical purposes <u>only</u>
First Name, Middle Name and Last Name	<ul style="list-style-type: none"> • For communication reason • For Payment purpose 	<ul style="list-style-type: none"> • You • GWR consulting Team
Your age <i>Calculated from your date of birth</i>	<ul style="list-style-type: none"> • For some type of visits: <ul style="list-style-type: none"> ○ pre-targeting of participants by age group ○ analysis of survey responses by age group 	<ul style="list-style-type: none"> • You • GWR Consulting Team • Our customers, for statistical purposes <u>only</u>
Your address	<ul style="list-style-type: none"> • To assign you mystery shopping visits close to your location 	<ul style="list-style-type: none"> • You • GWR Consulting Team
Phone number/ Email address	<ul style="list-style-type: none"> • To contact you to: <ul style="list-style-type: none"> ○ Check your availability for conducting Mystery shopping visits ○ Provide you with details related to the mystery shopping assignment ○ Check information related to the mystery shopping assignment that you have conducted ○ Ask you for referral ○ To inform you about GWR consulting new opportunities ○ To send you your performance evaluation ○ To inform you about your payment details (when needed) 	<ul style="list-style-type: none"> • You • GWR Consulting Team
Your answers recorded on the extended profile questionnaires	<ul style="list-style-type: none"> • For some mystery shopping visits: <ul style="list-style-type: none"> ○ pre-targeting of participants according to profile information 	<ul style="list-style-type: none"> • You • GWR Consulting Team

	<ul style="list-style-type: none"> ○ analysis of surveys responses according to profile information 	
Your Bank account details <i>(Bank name, Branch address, Account number, Iban number, Swift code)</i>	<ul style="list-style-type: none"> ● To transfer you your payment fee 	<ul style="list-style-type: none"> ● You ● GWR Consulting Team

Cookie Policy for Our Web and Mobile Platforms

What are Cookies?

Cookies are small bits of data that websites store on the device (computer, mobile phone, tablet, etc.) that are used during your access of our online websites, mobile apps, and services (collectively referred to as the “Platform”). You can read more about cookies generally on [Wikipedia](#).

This Cookie Policy describes what information our cookies and similar technologies gather, how we use it, why we store these cookies and for how long.

What Cookies Do We Use?

The Platform only uses first-party cookies (cookies set by the parts of the Platform you are visiting). We do not use third-party cookies (cookies set by a server outside of the Platform). We only use the following types of cookies:

1. **Required/Essential Cookies** – These are required for the Platform to properly function for you, such as Security/Authentication cookie – Purpose: When you log in and we authenticate your identity we use this cookie to confirm that you are logged in during your session. We set these cookies to be removed or cleared when you log out.
2. **Preference Cookies** – These store your selected configuration settings in the Platform, allowing us to remember and honor those settings as you interact with the Platform.

Managing/Disabling Cookies

To read more about how to manage or disable cookies, please read the help information for your web browser and/or device.

Please note that if you disable cookies our Platform will likely not operate correctly for you.

For Inquiries

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