

## **Systemised To Scale Limited Privacy Policy**

Systemised To Scale Limited - Privacy Notice under the Gibraltar Data Protection and the Gibraltar Data Protection Act 2004 (DPA004)

### **Definitions and Interpretation**

“Systemised To Scale Limited” means Systemised To Scale Limited (registered in Gibraltar, company number 125686) together with any subsidiaries.

“We/Us/Our” means Systemised To Scale Limited.

“Our Site” means the website [www.systemisedtoscale.com](http://www.systemisedtoscale.com).

“Our Platform” means the Systemised To Scale Limited Customer Relationship Management (CRM) software system.

### **Background**

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of Our clients and customers and of everyone who visits Our website, [www.systemisedtoscale.com](http://www.systemisedtoscale.com) (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site and when you enter into an agreement with Us for the provision of services.

#### **1. What Does This Notice Cover?**

This Privacy Policy explains how We use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

This notice applies however you provide personal information to Us, including but not limited to, online through our website, through an app, via social media, purchasing goods, entering competitions that we may run from time to time, participating in research activities or telephoning, emailing, writing or contacting us through WhatsApp or SMS.

## **2. What is Personal Data?**

Personal data is defined by the Gibraltar Data Protection Regulation and the Data Protection Act 2004 (DPA004) (together referred to as “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that We use is set out in Part 4, below.

## **3. What Are Your Rights?**

Under the Data Protection Legislation, you have the following rights, which We will always work to uphold:

- a. The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 10.
- b. The right to access the personal data We hold about you. Part 8 will tell you how to do this.
- c. The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 10 to find out more.
- d. The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We may hold. Please contact Us using the details in Part 10.
- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to Us using your personal data for a particular purpose or purposes or to withdraw any consent you have given Us and to opt out of any marketing communications that We may send you.
- g. The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- h. Rights relating to automated decision-making and profiling.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 10.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Gibraltar Regulatory Authority.

#### **4. What Personal Data Do We Collect?**

We will collect personal data on clients, customers, contacts, prospective clients and customers, contractors and employees. Personal data collected will vary according to your relationship with Us and may include (but is not limited to):

- Personal data including name, date of birth, gender, physical activity readiness and other relevant demographic information;
- Marital status;
- Nationality and residency (the country you live and national identifiers such as social security or passport number);
- Job title and / or profession including CV;
- Bank account details;
- Contact details including username, address, email address and phone numbers;
- Social media handles;
- Criminal convictions and offences details may be collected when carrying out background screening to prevent crime;
- Services used by you;
- Purchases and orders made by you;
- Communication and marketing preferences;
- Technical information such as devices and technology you use and website browser settings;
- Behavioural and usage information such as how you use and access our digital services;
- Your location;
- Correspondence and communications that you hold with us;
- Financial and payment information;
- Other publicly available personal data, including any which you have shared via a public platform (such as Instagram, YouTube, X or public Facebook page);
- Special category information including health, fitness and/or medical data. We may get this information from forms you submit to Us or data recorded on our platform concerning notes and reports about health and treatment and care you may have received or need;
- Information contained within identity documents, including passport and driving licence (via the holding and storing of these documents);
- Statutory reference numbers, including social security number and unique tax reference (UTR), or overseas equivalents such as Tax Identification Numbers (TINs); and
- Information about your interests, preferences, feedback, competition and survey responses.

## 5. How Do We Use Your Personal Data?

Under the Data Protection Legislation, We must always have a lawful basis for using personal data. This may be because the data is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data, or because it is in Our legitimate business interests to use it. Business purposes may include use of our client management platform, sales and marketing, personnel, administrative, financial, regulatory, payroll and business development purposes. Your personal data may be used for the following purposes:

- Entering into a contract with you and for Us to provide services to you. Utilising data in the provision of our services including sales and marketing, along with use of our client management platform.
- Personalising and tailoring Our services to you.
- Operational reasons, such as recording data on our client management platform, training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking.
- With your agreement, to contact you about promotional offers, events, products and services which we think may be of interest to you.
- Communicate promotions to you through online media.
- For analysis, insight and research purposes in order for Us to better understand your needs and ensure that We are giving you what you want.
- Identify and contact competition winners.
- Manage customer services.
- Compliance with our legal, regulatory and corporate governance obligations and good practice including gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests.
- Supplying you with information by email, social media, SMS, telephone, WhatsApp and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing us at [info@systemisedtoscale.com](mailto:info@systemisedtoscale.com)).

With your permission and/or where permitted by law, We may use your personal data for marketing purposes, which may include contacting you by email, social media, SMS, telephone and/or post with information, news, and offers on Our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation, and you will always have the opportunity to opt-out.

We will only use your personal data for the purposes for which we collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If We need to use your personal data for a purpose unrelated to the purpose for which we collected the data, We will notify you and We will explain the legal ground for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We may also show you online media communications through external social media platforms such as Facebook and Instagram and external advertisers such as Google, TikTok and YouTube.

You have the right to opt out of receiving promotional communications at any time by contacting Us as detailed in Part 10. This may not stop messages such as order updates.

Another example of how We may tailor communications with you is through grouping individuals with similar interests using data to send product news or promotional offers relevant to shared interests. You have the right to opt out of any such automated processing, including profiling, at any time by contacting Us as detailed in Part 10.

You have the right to withdraw consent at any time. Where consent is the only legal basis for Us to process your data, We will cease to process data after consent is withdrawn.

## **Data Security**

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. Such third parties will only process your personal data on Our instructions, and they are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

You should be careful when sharing personal data.

You may wish to consider the following security measures to increase your own data security:

- If using a device in a public location, be sure to log out and close the website browser fully at the end of your online session;
- Keep account usernames and passwords private;
- Use secure and difficult passwords so that hackers can't easily guess from personal data that they easily obtain;
- Frequently change your password; and
- Use different passwords for all online accounts.

We use online/cloud based systems, including but not limited to the following:

High Level: The data that We collect from you may be transferred to, and stored, with High Level. If you wish to visit their website to find out more about and read about how they handle personal data in accordance with their Privacy Policy <https://www.gohighlevel.com/privacy-policy> and <https://www.gohighlevel.com/privacy-and-security>.

Stripe: We use Stripe for collecting your payments. We will pass some of your personal information to Stripe, including your contact and order details. If you wish to visit Stripe's website to find out more about how they handle your personal data in their Privacy and Terms policy go to <https://stripe.com/gb/privacy>

## **6. How Long Will We Keep Your Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected and/or for the purposes of satisfying any legal, accounting, or reporting requirements.

In determining the appropriate retention period for personal data, We consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For tax purposes, We may keep information about Our clients and customers, including contact, identity, financial and transactional data, for a minimum of 6 years after We cease providing Our services.

For legal purposes, We may keep information about you, for example regarding compliance with legal and regulatory requirements and in order to establish or defend Our legal rights.

In some circumstances you can ask Us to delete your data as detailed in Part 3 above.

In some circumstances We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case We may use this information independently without further notice to you.

## **7. How and Where Do We Store, Share or Transfer Your Personal Data?**

We offer the use of online/cloud-based systems to our clients and customers for which We are the Licensee and We use such systems internally for client management and administrative purposes. These systems are subject to the terms of a suitably compliant sub-processing agreement with the relevant supplier.

For Us to supply and deliver products and services to you, it may be necessary for Us to share your personal data outside of the European Economic Area (the EEA). This may occur when service providers are located outside of the EEA and/or if you are based outside the EEA. Such transfers of data are subject to special rules under the data protection laws. Where We transfer personal data outside of the EEA, We will ensure that the transfer of data is compliant with the GDPR or to equivalent standards by law.

Where any online/cloud-based systems are based outside the EEA then We may store, share or transfer personal data to a 'third country'. In such cases, We take every reasonable measure and precaution to protect and secure your data to a similar degree by ensuring that:

- a. any such country has been deemed to provide an adequate level of protection for personal data by the European Commission; or
- b. We use specific contracts or codes of conduct or certification mechanisms approved by the Gibraltar Regulatory Authority and/or the European Commission which give personal data the same protection it has in Gibraltar or

If none of the above safeguards is available, We may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

We may store, share or transfer your personal data with any companies within the Systemised To Scale group (being Systemised To Scale Limited together with its subsidiaries and other companies within the same group of companies of which Systemised To Scale Limited is a member), their directors and officers, employees, consultants, sub-contractors and advisers, some of which may be located outside of Gibraltar or the EEA.

We may have to share your personal data with third parties, including service providers, professional advisers, the Gibraltar Income Tax Office, regulators and other authorities in Gibraltar and other relevant jurisdictions who require reporting of processing activities in certain circumstances. Where We require your consent to transfer your data in these circumstances, We will notify you accordingly.

We require all third parties to whom We transfer your data to respect the security of your personal data and treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and, where relevant, in accordance with our instructions.

If any of your personal data is required by a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party's obligations under the law.

In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **8. How Can You Access Your Personal Data?**

If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal address shown in Part 10.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will usually respond to your subject access request within one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be informed if We are extending the time to respond and will be kept fully informed of Our progress.

## **9. Third-Party Links and Cookies**

Our Site and Our Platform may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave Our Site or Our Platform, We encourage you to read the privacy notice of every website you visit.

A cookie is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operation to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use cookies to identify which pages of Our Site are being used. This helps Us analyse data and improve Our Site in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Likewise, we identify which features of Our Platform are used to help Us analyse data and improve our service offering.

Overall, cookies help Us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives Us access to your computer or any information about you, other than data you choose to share with Us.



You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you decline cookies this may prevent you from taking full advantage of Our Site.

#### **10. How Do You Contact Us?**

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following contact details:

Email address: [info@systemisedtoscale.com](mailto:info@systemisedtoscale.com)

#### **11. Changes To This Privacy Notice**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

Please check this Privacy Policy from time to time to ensure you are aware of any updates we may have made to Our personal data handling practices. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site, or on receipt by any other means, following the alterations.

*Last updated: November 2025*