

PRIVACY NOTICE - 2022

Welcome to Ground Control Technologies UK Ltd. t/a as YB Tracking (YB Tracking) privacy notice.

YB Tracking respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. PURPOSE OF THIS PRIVACY NOTICE.

- 1.1 - All data collected by YB Tracking for and through the use of the Service adhere to the following General Data Protection Regulation [2016/679] from the 25 May 2018.
- 1.2 - This privacy notice aims to give you information on how YB Tracking collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up for our newsletter, purchase a product or service or take part in a competition.
- 1.3 - This website is not intended for children, and we do not knowingly collect data relating to children.
- 1.4 - It is essential that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2. CONTROLLER.

- 2.1 - YB Tracking Limited is the controller and responsible for your personal data (collectively referred to as "YB Tracking", "we", "us", or "our" in this privacy notice).
- 2.2 - We have appointed a data protection officer (DPO) responsible for overseeing questions concerning this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details below.

3. CONTACT DETAILS.

Full name of legal entity:	Ground Control Technologies UK Ltd. t/a YB Tracking
Name or title of DPO:	Business Development Manager
Email address:	dataprotection@groundcontrol.com .
Postal address:	Unit D2, Churcham Business Park, Churcham, Gloucestershire, GL2 8AX.

4. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

- 4.1 - This version was last updated on 10th May 2018, and historic versions can be obtained by contacting us.
- 4.2 - It is essential that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

5. WHAT ARE COOKIES, AND HOW DO WE USE THEM?

- 5.1 - Cookies are pieces of information that YB Tracking will transfer to your computer's hard drive through your browser enables YB Tracking's systems to recognise your browser. Cookies also enable YB Tracking to gather information about the use of its website and to enhance the website accordingly to the users' preferences. The Help option on the toolbar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. YB Tracking's cookies do not contain any identifying information. Please bear in mind that some personalised services may not be available if you choose to disable cookies.

6. WHAT IS PERSONAL DATA?

- 6.1 - In order to provide you with a service, we need to have certain information about you. Personal data means the facts we collect about you when you sign up to the Service, when you access Services from the website or your mobile phone, and when you use these Services.

7. THIRD-PARTY LINKS.

- 7.1 - Our web platforms (including this website) may contain links or add-ons from/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 website, we encourage you to read the privacy notice of every website you visit.

8. THE DATA WE COLLECT ABOUT YOU.

- 8.1 - Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 8.2 - We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data may include first name, last name, username or similar identifier, and company name.

Contact Data may include billing address, delivery address, email address and telephone numbers.

Financial Data may include bank accounts and references to payment cards (although we never store any payment card information ourselves, we use a third-party provider to keep this secure).

Transaction Data may include details about payments to and from you and other details of products and services you have purchased from us.

Device Data may include any transmissions that have passed to/from your devices, including position data, message data, and any custom formatted payloads that your device transfers.

Technical Data may include internet protocol (IP) address, your login data (passwords always stored in a one-way encrypted hash, not plain text), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Data may include your username and password (passwords always stored in a one-way encrypted hash, not plain text), purchases or orders made by you, your interests, preferences, feedback and survey responses.

Usage Data may include information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from our third parties and us and your communication preferences.

8.3 - We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you; we treat the combined data as personal data which will be used in accordance with this privacy notice.

8.4 - We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

9. HOW LONG WILL WE HOLD YOUR DATA?

9.1 - There are strict obligations that define how long we may hold personal data about you. These obligations are included in data protection and data retention legislation.

10. FOR WHAT DO WE USE IT?

We need this information to confirm your identity and process your order when you first sign up for our Service. We may also use Your personal data for the following:

- 10.1 - Regulatory Compliance We may use your data to meet our regulatory obligations, and in some cases, we will need to share this data with regulators, for example, if you make a complaint.
- 10.2 - Credit Referencing, We may use your data for the purposes of undertaking credit reference searches and analysing of credit worthiness during the term of this Agreement.
- 10.3 - Marketing activities If you have requested information regarding our product and Services, we will attempt to contact you via phone and email regarding the specific product you have inquired about. Should we receive no further contact from you, we will delete your data after a period of 12 months.

If you have consented to the use of personal data for marketing purposes, then we may use your personal data to send you information about additional services that we provide.

- 10.4 - Collecting traffic data, we may hold Data about the numbers and lengths of calls, SMS sent, and data network usage made in order to bill you for your services. We will also, for a short period of time, hold data in relation to the websites and IP addresses that your devices have used.

11. CAN I SEE THE DATA YOU HOLD ABOUT ME, HAVE IT CHANGED OR REMOVED?

- 11.1 - Yes. You may ask for a copy of the personal data we hold on you, have it changed or have all personal data removed by sending a letter to the Data Controller:

Ground Control Technologies UK Ltd.t/a YB Tracking, Unit D2, Churcham Business Park, Churcham, Gloucestershire, GL2 8AX.

Alternatively, you can email your request to: dataprotection@groundcontrol.com.

Please outline your request, and we will respond initially within five days to confirm we can process your request and then complete the request within 30 days.

12. HOW DOES YB TRACKING PROTECT YOUR PERSONAL INFORMATION?

12.1 – YB Tracking takes appropriate organisational and technical measures to protect the personal data and traffic data provided to it or collected by it and does not retain it any longer than permitted in order to perform its services or as required under relevant legislation. Authorised employees of YB Tracking can only access your personal data and traffic data. They need access to these data in order to be able to fulfil their given duties.

12.2 – YB Tracking takes appropriate technical measures to manage its Information Security policy.

12.3 – YB Tracking takes appropriate technical measures to protect the confidentiality of the communications content via its YB Tracking services and observes applicable obligations and exceptions under the relevant legislation.¹¹

13. WILL THIS POLICY CHANGE?

This privacy policy may change from time to time for either legal or business reasons. In particular, you should check this Policy regularly for compliance purposes. If any changes are made, a revised privacy policy will be published on our website.

UPDATED ~~14/04/22~~ 08/08/22- MICHAEL SENTCH