

# G F O R C E S

## Service data summaries

May 2020

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# NetDirector® Auto V10

## Service

NetDirector® Auto V10

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Digital Footprint

## Categories of data subject

End users of the Customer's website *(customers and prospective customers)*

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Providing the Customer with an effective consumer-facing website
- Presenting the Customer with information on the performance and effectiveness of its website, including site traffic and visitor behaviour
- Providing technical support services

In addition, if *(and for as long as)* the Customer has opted for the following components of the Services under its Agreement with GForces, data is processed for the purposes stated:

- **Finance Integration** *(Codeweavers, iVendi, Evolution Funding, Santander)* - for the generation of representative vehicle finance quotes *(Digital Footprint only)*
- **Retargeting** *(Google Adwords)* - for the retargeting of advertising to end-users when they visit other sites

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For the Term of the Agreement, plus the period from expiry of the Term until deletion of Personal Data by GForces in accordance with the Data Processing Policy.

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**Data transfers outside the EEA**

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

**Subprocessors****All customers:**

- Amazon Web Services, Inc. (*cloud platform provider*)
- Google, Inc for Google Analytics (*web analytics services performed at the instruction of GForces to track and report site traffic*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer****If (and for as long as) the Customer has opted for the following components of the Services under its Agreement with GForces:**

**Google Inc. for Google Analytics** (*web analytics services performed at the instruction of Customer to track and report site traffic*). Customer acknowledges that any account opened by GForces for the purposes of running web analytics activity is operated on the Customer's behalf, and that any terms (*including data processing terms*) are accepted on behalf of the Customer.

**Retargeting:** Google Inc. for Google Adwords, Microsoft Ireland Operations Limited for Bing Ads, (*for retargeting of advertising to end- users when they visit other sites*). Customer acknowledges that any account opened by GForces for the purposes of running retargeting activity is operated on the Customer's behalf, and that any terms (*including data processing terms*) are accepted on behalf of the Customer.

## NetDirector<sup>®</sup> Auto-e (Full end to end)

**Service**NetDirector<sup>®</sup> Auto-e (EtoE)**Types of personal data**

(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)

- Personal Information
- Digital Footprint
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Employment Data (*processed by sub-processor*)
- Financial Information (*processed by sub-processor*)
- Other (*VRM*)

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**Categories of data subject**

*Note: Due to the functionality allowed within the Enquiry Manager product, all enquiry forms are fully customisable, and Data Controller would be able to request any type of personal data, which GForces may not be informed about.*

End users of the Customer's website (*customers and prospective customers*)

**Processing by GForces****Purpose of processing**

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Providing the Customer with an effective consumer-facing website
- Presenting the Customer with information on the performance and effectiveness of its website, including site traffic and visitor behaviour
- Providing technical support services
- Connecting the Customer with consumers who are interested in the Customer's products and services, obtaining a vehicle valuation or purchasing a vehicle by collecting and passing on contact details and enquiries, valuations and payment details to the Customer
- Passing enquiries to third parties as instructed by the Customer

In addition, if (*and for as long as*) the Customer has opted for the following components of the Services under its Agreement with GForces, data is processed for the purposes stated:

- **Retargeting** (*Google Adwords*) - for the retargeting of advertising to end-users when they visit other sites
- **Personalisation** – to offer repeat visitors to the website the option to replicate their previous search, and to display recommended alternatives to vehicles previously searched.

**Nature of processing**

- The collection, storage and transfer of data for the purposes listed above

**Duration of processing**

- **Website** - For the Term of the Agreement, plus the period from expiry of the Term until deletion of Personal Data by GForces in accordance with the Data Processing Policy.
- **Enquiry Forms, Valuations, Online Payments** - For thirty one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

**Data transfers outside the EEA**

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has

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entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

## Subprocessors

### All customers

- Amazon Web Services, Inc. (*cloud platform provider*)
- Codeweavers Ltd (*displaying finance calculator for representative finance, and displaying, processing and decisions on finance applications with finance lenders*)
- Auth0, Inc (*Authentication provider for account creation and login*)
- Google, Inc for Google Analytics (*web analytics services performed at the instruction of GForces to track and report site traffic*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

If (*and for as long as*) the Customer has opted for the following components of the Services under its Agreement with GForces

- **Personalisation.** Amazon Web Services, Inc. (*as provider of Amazon Personalize, a machine-learning recommendation service*)

## Data transfers to third parties engaged by Customer

If (*and for as long as*) the Customer has opted for the following components of the Services under its Agreement with GForces:

- **Payment Gateway:** Stripe Payments Europe Ltd to take payment in full or a deposit for a vehicle.
- **Valuation Provider:** cap hpi limited

- **Google Inc. for Google Analytics** (*web analytics services performed at the instruction of Customer to track and report site traffic*). Customer acknowledges that any account opened by GForces for the purposes of running web analytics activity is operated on the Customer's behalf, and that any terms (*including data processing terms*) are accepted on behalf of the Customer.

- **Retargeting:** Google Inc. for Google Adwords, Microsoft Ireland Operations Limited for Bing Ads, (*for retargeting of advertising to end- users when they visit other sites*). Customer acknowledges that any account opened by GForces for the purposes of running retargeting activity is operated on the Customer's behalf, and that any terms (*including data processing terms*) are accepted on behalf of the Customer.

- **CRM/Lead Management systems:** Fastrack, AutoSLM, Vital Software, enquiryMAX, CDK, DealerWeb, CallItAutomotive, Pinewood, Close IT, Contact Advantage, Kerridge, RAPID, Salesforce, Dynamics.

*Note: This list is non-exhaustive and subject to change based on the instructions from GForces customers. Data transferred from this product is not actively pushed out via the API, however data is pulled from the third parties.*

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# NetDirector® Auto-e (Full end to end) (Middle East)

## Service

NetDirector® Auto-e (EtoE)

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Digital Footprint
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Employment Data (*processed by sub-processor*)
- Financial Information (*processed by sub-processor*)
- Other (*VRM*)

*Note: Due to the functionality allowed within the Enquiry Manager product, all enquiry forms are fully customisable, and Data Controller would be able to request any type of personal data, which GForces may not be informed about.*

## Categories of data subject

End users of the Customer's website (*customers and prospective customers*)

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Providing the Customer with an effective consumer-facing website
- Presenting the Customer with information on the performance and effectiveness of its website, including site traffic and visitor behaviour
- Providing technical support services
- Connecting the Customer with consumers who are interested in the Customer's products and services, obtaining a vehicle valuation or purchasing a vehicle by collecting and passing on contact details and enquiries, valuations and payment details to the Customer
- Passing enquiries to third parties as instructed by the Customer

In addition, if (*and for as long as*) the Customer has opted for the following components of the Services under its Agreement with GForces, data is processed for the purposes stated:

- **Retargeting** (*Google Adwords*) - for the retargeting of advertising to end-users when they visit other sites

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

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	<p><b>Duration of processing</b></p> <ul style="list-style-type: none"> <li>• <b>Website</b> - For the Term of the Agreement, plus the period from expiry of the Term until deletion of Personal Data by GForces in accordance with the Data Processing Policy.</li> <li>• <b>Enquiry Forms, Valuations, Online Payments</b> - For thirty one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.</li> </ul>
<p><b>Data transfers outside the EEA</b></p>	<p>GForces' wholly owned subsidiaries GForces Web Management FZ LLC (<i>UAE</i>) and GForces Vietnam Web Management Company Limited (<i>Vietnam</i>) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.</p> <p>There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.</p>
<p><b>Subprocessors</b></p>	<p><b>All customers</b></p> <ul style="list-style-type: none"> <li>• Amazon Web Services, Inc. (<i>cloud platform provider</i>)</li> <li>• Codeweavers Ltd (<i>displaying finance calculator for representative finance, and displaying, processing and decisions on finance applications with finance lenders</i>)</li> <li>• Auth0, Inc (<i>Authentication provider for account creation and login</i>)</li> <li>• Google, Inc for Google Analytics (<i>web analytics services performed at the instruction of GForces to track and report site traffic</i>)</li> <li>• GForces Web Management FZ LLC (<i>wholly owned subsidiary, Access only</i>)</li> <li>• GForces Vietnam Web Management Company Limited (<i>wholly owned subsidiary, access Only</i>)</li> </ul>
<p><b>Data transfers to third parties engaged by Customer</b></p>	<p>If (<i>and for as long as</i>) the Customer has opted for the following components of the Services under its Agreement with GForces:</p> <ul style="list-style-type: none"> <li>• <b>Payment Gateway:</b> KNpay or Payfort to take payment in full or a deposit for a vehicle.</li> <li>• <b>Valuation Provider:</b> cap hpi limited</li> </ul>



- **Google Inc. for Google Analytics** (*web analytics services performed at the instruction of Customer to track and report site traffic*). Customer acknowledges that any account opened by GForces for the purposes of running web analytics activity is operated on the Customer's behalf, and that any terms (*including data processing terms*) are accepted on behalf of the Customer.
- **Retargeting:** Google Inc. for Google Adwords, Microsoft Ireland Operations Limited for Bing Ads, (*for retargeting of advertising to end- users when they visit other sites*). Customer acknowledges that any account opened by GForces for the purposes of running retargeting activity is operated on the Customer's behalf, and that any terms (*including data processing terms*) are accepted on behalf of the Customer.
- **CRM/Lead Management systems:** Fastrack, AutoSLM, Vital Software, enquiryMAX, CDK, DealerWeb, CallItAutomotive, Pinewood, Close IT, Contact Advantage, Kerridge, RAPID, Salesforce, Dynamics.

*Note: This list is non-exhaustive and subject to change based on the instructions from GForces customers. Data transferred from this product is not actively pushed out via the API, however data is pulled from the third parties.*

## NetDirector® Auto-e (Payments Enabled)

### Service

NetDirector® Auto-e (Payments Enabled)

### Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Digital Footprint
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Employment Data (*processed by sub-processor*)
- Financial Information (*processed by sub-processor*)
- Other (*VRM*)

*Note: Due to the functionality allowed within the Enquiry Manager product, all enquiry forms are fully customisable, and Data Controller would be able to request any type of personal data, which GForces may not be informed about.*

### Categories of data subject

End users of the Customer's website (*customers and prospective customers*)

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## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Providing the Customer with an effective consumer-facing website
- Presenting the Customer with information on the performance and effectiveness of its website, including site traffic and visitor behaviour
- Providing technical support services
- Connecting the Customer with consumers who are interested in the Customer's products and services, obtaining a vehicle valuation or purchasing a vehicle by collecting and passing on contact details and enquiries, valuations and payment details to the Customer
- Passing enquiries to third parties as instructed by the Customer

In addition, if (*and for as long as*) the Customer has opted for the following components of the Services under its Agreement with GForces, data is processed for the purposes stated:

- **Retargeting** (*Google Adwords*) - for the retargeting of advertising to end-users when they visit other sites
- **Finance Integration** (*Codeweavers, iVendi, Evolution Funding, Santander*) - for the generation of representative vehicle finance quotes (*Digital Footprint only*)

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- **Website** - For the Term of the Agreement, plus the period from expiry of the Term until deletion of Personal Data by GForces in accordance with the Data Processing Policy.
- **Enquiry Forms, Valuations, Online Payments** - For thirty one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this

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process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

### Subprocessors

#### All customers

- Amazon Web Services, Inc. (*cloud platform provider*)
- Google, Inc for Google Analytics (*web analytics services performed at the instruction of GForces to track and report site traffic*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

### Data transfers to third parties engaged by Customer

If (*and for as long as*) the Customer has opted for the following components of the Services under its Agreement with GForces:

- **Payment Gateway:** Stripe Payments Europe Ltd to take payment in full or a deposit for a vehicle.
- **Valuation Provider:** cap hpi limited

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- **Google Inc. for Google Analytics** (*web analytics services performed at the instruction of Customer to track and report site traffic*). Customer acknowledges that any account opened by GForces for the purposes of running web analytics activity is operated on the Customer's behalf, and that any terms (*including data processing terms*) are accepted on behalf of the Customer.
- **Retargeting:** Google Inc. for Google Adwords, Microsoft Ireland Operations Limited for Bing Ads (*for retargeting of advertising to end- users when they visit other sites*). Customer acknowledges that any account opened by GForces for the purposes of running retargeting activity is operated on the Customer's behalf, and that any terms (*including data processing terms*) are accepted on behalf of the Customer.
- **CRM/Lead Management systems:** Fastrack, AutoSLM, Vital Software, enquiryMAX, CDK, DealerWeb, CallItAutomotive, Pinewood, Close IT, Contact Advantage, Kerridge, RAPID, Salesforce, Dynamics.

*Note: This list is non-exhaustive and subject to change based on the instructions from GForces customers. Data transferred from this product is not actively pushed out via the API, however data is pulled from the third parties.*

# NetDirector® Enquiry Manager V1

## Service

NetDirector® Enquiry Manager V1

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Digital Footprint
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Other (*VRM*)

## Categories of data subject

End users of the Customer's website (*customers and prospective customers*)

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Connecting the Customer with consumers who are interested in the Customer's products and services by collecting and passing on contact details and enquiries submitted by Customers
- Passing enquiries to third parties as instructed by the Customer
- **Retargeting** (*Google Adwords*) - for the retargeting of advertising to end-users when they visit other sites
- **Finance Integration** (*Codeweavers, iVendi, Evolution Funding, Santander*) - for the generation of representative vehicle finance quotes (*Digital Footprint only*)

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For thirty-one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

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**Data transfers outside the EEA**

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

**Subprocessors****All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

If (*and for as long as*) the Customer has instructed GForces to transfer to a third party:

- CRM/Lead Management systems: Fastrack, AutoSLM, Vital Software, enquiryMAX, CDK, DealerWeb, CallItAutomotive, Pinewood, Close IT, Contact Advantage, Kerridge, RAPID, Salesforce, Dynamics.

*Note: This list is non-exhaustive and subject to change based on the instructions from GForces customers.*

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# NetDirector® Enquiry Manager V2

## Service

NetDirector® Enquiry Manager V2

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Digital Footprint
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Other (VRM)

*Note: Due to the functionality allowed within this product, all enquiry forms are fully customisable, and Data Controller would be able to request any type of personal data, which GForces may not be informed about.*

## Categories of data subject

End users of the Customer's website (*customers and prospective customers*)

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Connecting the Customer with consumers who are interested in the Customer's products and services by collecting and passing on contact details and enquiries submitted by Customers
- Passing enquiries to third parties as instructed by the Customer

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For thirty-one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

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**Subprocessors****All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

If (*and for as long as*) the Customer has instructed GForces to transfer to a third party:

- **CRM/Lead Management systems:** Fastrack, AutoSLM, Vital Software, enquiryMAX, CDK, DealerWeb, CallItAutomotive, Pinewood, Close IT, Contact Advantage, Kerridge, RAPID, Salesforce, Dynamics.

*Note: This list is non-exhaustive and subject to change based on the instructions from GForces customers. Data transferred from this product is not actively pushed out via the API, however data is pulled from the third parties.*



# NetDirector® Valuations

## Service

NetDirector® Valuations

### Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Digital Footprint
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Other (*VRM*)

### Categories of data subject

End users of the Customer's website (*customers and prospective customers*)

### Processing by GForces

#### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Connecting the Customer with consumers who are interested in the Customer's products and services by collecting and passing on contact details and enquiries submitted by Customers
- Passing enquiries to third parties as instructed by the Customer

#### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

#### Duration of processing

- For thirty-one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

### Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

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**Subprocessors****All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

If (*and for as long as*) the Customer has instructed GForces to transfer to a third party:

- **Valuation Provider:** cap hpi limited
- **CRM/Lead Management systems:** Fastrack, AutoSLM, Vital Software, enquiryMAX, CDK, DealerWeb, CallItAutomotive, Pinewood, Close IT, Contact Advantage, Kerridge, RAPID, Salesforce, Dynamics.

*Note: This list is non-exhaustive and subject to change based on the instructions from GForces customers.*

**G F O R C E S**

# NetDirector<sup>®</sup> Service Centre

## Service

NetDirector<sup>®</sup> Service Centre

### Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal information
- Digital Footprint
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Other (*VRM*)

### Categories of data subject

End users of the Customer's website (*customers and prospective customers*)

### Processing by GForces

#### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Connecting the Customer with consumers who are interested in the Customer's products and services by collecting and passing on contact details and enquiries submitted by Customers
- Passing enquiries to third parties as instructed by the Customer

#### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

#### Duration of processing

- For thirty-one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

### Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

**G F O R C E S**

**Subprocessors****All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

If (*and for as long as*) the Customer has instructed GForces to transfer to a third party:

- **CRM/Lead Management systems:** Fastrack, AutoSLM, Vital Software, enquiryMAX, CDK, DealerWeb, CallItAutomotive, Pinewood, Close IT, Contact Advantage, Kerridge, RAPID, Salesforce, Dynamics.
- **Others:** Stapleton's (*Tyre Services*) Ltd, carweb limited, and EMaC Ltd

*Note: These lists are non-exhaustive and subject to change based on the instructions from GForces customers.*

# NetDirector® Online Payments

## Service

NetDirector® Online Payments

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Digital Footprint
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Other (*VRM*)

## Categories of data subject

End users of the Customer's website (*customers and prospective customers*)

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Connecting the Customer with consumers who are interested in the Customer's products and services by collecting and passing on contact details and enquiries submitted by Customers
- Passing enquiries to third parties as instructed by the Customer

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For thirty-one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

**G F O R C E S**

**Subprocessors****All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

If (*and for as long as*) the Customer has instructed GForces to transfer to a third party:

- **Payment Gateway:** Stripe Payments Europe Ltd, and PayPal (*Europe*) S.à r.l. et Cie, S.C.A.
- **CRM/Lead Management systems:** Fastrack, AutoSLM, Vital Software, enquiryMAX, CDK, DealerWeb, CallItAutomotive, Pinewood, Close IT, Contact Advantage, Kerridge, RAPID, Salesforce, Dynamics.

# NetDirector® Call Manager / Bank

## Service

NetDirector® Call Manager

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Biographical Data
- Financial Information
- Employment Data
- Special Categories
- Payment Card Industry Data (PCI)
- Other

*Note: All information and data contained within call recordings is uncontrolled by GForces. Data Subject may offer information without prompt in relation to any of the categories listed above.*

## Categories of data subject

End users of the Customer's website *(customers and prospective customers)*

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Reporting on inbound calls to Customer
- Assessing quality of response during inbound calls to Customer
- Storage of inbound call recordings to Customer
- Management of dynamic phone numbers of Customer

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For thirty-one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC *(UAE)* and GForces Vietnam Web Management Company Limited *(Vietnam)* provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

# G F O R C E S

**Subprocessors**

**All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

None



# NetDirector® Chat Manager

## Service

NetDirector® Chat Manager

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Biographical Data
- Financial Information
- Employment Data
- Special Categories
- Payment Card Industry Data (PCI)
- Other

*Note: All information and data contained within call recordings is uncontrolled by GForces. Data Subject may offer information without prompt in relation to any of the categories listed above.*

## Categories of data subject

End users of the Customer's website (*customers and prospective customers*)

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Reporting on inbound chats to Customer;
- Assessing quality of response during inbound chats to Customer;
- Storing chat transcripts

In addition, the relevant chat providers (BoldChat, CallItAutomotive, Gubagoo) process data for the purposes stated:

- Generating chat transcripts and responding to inbound chats as an extension of Customer

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For six (6) months from the point of data capture, i.e. when the consumer has a chat. This data will be held for a further fourteen (14) days in archive.

**G F O R C E S**

**Data transfers outside the EEA**

Yes, Gubagoo and BoldChat data is held in the US.

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

**Subprocessors**

- All customers**
- Amazon Web Services, Inc. (*cloud platform provider*)
  - LogMeIn, Inc t/a BoldChat (*Chat Provider*)
  - Call It Automotive Ltd (*Chat contact centre for BoldChat*)
  - Gubagoo, Inc. (*Chat Provider*)
  - GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
  - GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

None

# NetDirector<sup>®</sup> Vision

## Service

NetDirector<sup>®</sup> Vision

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information

## Categories of data subject

Customer's employees/representatives

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Providing access to the application
- Reporting on operational usage

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For thirty-one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

**G F O R C E S**

**Subprocessors**

**All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

None

# NetDirector® Trade

## Service

NetDirector® Trade

## Types of

### personal data

(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)

- Personal Information
- Biographical Data (*Gender can be inferred from the collection of Data Subject's Title*)
- Other (VRM)

## Categories of data subject

End users of the Customer (*customers and prospective customers*) and Customer's employees/representatives.

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Connecting the Customer with consumers who are interested in the Customer's products and services by collecting and passing on contact details and enquiries submitted by Customers
- Provide a trading platform for buying and selling stock between the Customer and registered consumers
- Maintaining transactional history of trades within the platform
- Tracking visitor journeys and analysing engagement levels

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For the Term of the Agreement, plus the period from expiry of the Term until deletion of Personal Data by GForces in accordance with the Data Processing Policy

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

# G F O R C E S

**Subprocessors**

**All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

None

# My NetDirector®

## Service

My NetDirector®

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information

## Categories of data subject

Customer's employees/representatives

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Providing access to the application.
- Providing live chat services for support purposes.
- Keeping records for Customer of employees/representatives accessing the Services

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

- For thirty-one (31) days from the point of data capture when the consumer makes the enquiry. This data will be held for a further fourteen (14) days in archive.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

**G F O R C E S**

**Subprocessors**

**All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- Zendesk, Inc. (*live chat provider*)
- EnableIT Technologies LTD Limited (*Sugar CRM integration*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

None



# Gubagoo Live Chat

<b>Service</b>	Gubagoo Live Chat ( <i>Standalone product</i> )
<b>Types of personal data</b> (Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)	<ul style="list-style-type: none"> <li>• Personal Information</li> <li>• Biographical Data</li> <li>• Financial Information Employment Data</li> <li>• Special Categories</li> <li>• Payment Card Industry Data (PCI) Other</li> </ul> <p><i>Note: GForces does not anticipate that any data other than Personal Information will be provided. However, all information and data contained within online chats is uncontrolled by GForces. Data Subject may offer information without prompt in relation to any of the categories listed above.</i></p>
<b>Categories of data subject</b>	End users of the Customer ( <i>customers and prospective customers</i> ) and Customer's employees/representatives.
<b>Processing by GForces</b>	<p><b>Purpose of processing</b></p> <p>GForces (<i>through Gubagoo as subprocessor</i>) processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:</p> <ul style="list-style-type: none"> <li>• Generating chat transcripts and responding to inbound chats as an extension of Customer;</li> <li>• Tracking visitor journeys and analysing engagement levels;</li> <li>• Providing information on conversion rates;</li> <li>• Presenting the Customer with information on the performance and Effectiveness of the chat service, including site traffic and visitor behaviour</li> <li>• Storing chat transcripts and visitor behaviour data</li> </ul> <p><b>Nature of processing</b></p> <ul style="list-style-type: none"> <li>• The collection, storage and transfer of data for the purposes listed above</li> </ul> <p><b>Duration of processing</b></p> <ul style="list-style-type: none"> <li>• For six (6) months from the point of data capture, i.e. when the consumer has a chat</li> </ul>
<b>Data transfers outside the EEA</b>	Yes, Gubagoo data is held in the US under the EU-US Privacy Shield.
<b>Subprocessors</b>	<p><b>All customers</b></p> <ul style="list-style-type: none"> <li>• Amazon Web Services, Inc. (<i>cloud platform provider</i>) Gubagoo, Inc. (<i>Chat Provider</i>)</li> <li>• Twillo, Inc. (<i>SMS service provider</i>)</li> <li>• Facebook, Inc. (<i>Messenger engine</i>)</li> </ul>
<b>Data transfers to third parties engaged by Customer</b>	None

**G F O R C E S**

# NetDirector® Console

## Service

NetDirector® Console

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information
- Digital Footprint
- Employment Data

## Categories of data subject

Customer employees/representatives

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Providing access to GForces technology
- Managing the Services

### Nature of processing

- The collection, storage and transfer of data for the purposes listed above

### Duration of processing

User login credentials will be held for the duration of the Agreement, and for one (1) month post termination. This data will be held for a further fourteen (14) days in archive.

Log data of user activity will be held indefinitely for the purposes of incident management investigations and/or resolving disputes.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

**G F O R C E S**

**Subprocessors**

**All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

None

# NetDirector® BI

## Service

NetDirector® BI

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Personal Information

## Categories of data subject

Customer employees/representatives

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- Providing access to the application

### Nature of processing

- Providing access to the application

### Duration of processing

- For one hundred and eight three (183) days from the point of data capture when the consumer makes the enquiry.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

# G F O R C E S

**Subprocessors**

**All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

None

# NetDirector® Vehicle Data Manager

## Service

NetDirector® Vehicle Data Manager

## Types of personal data

*(Please see the table at the end of this Schedule which sets out the elements of personal data included within each type)*

- Other (VIN and VRM)

## Categories of data subject

None

## Processing by GForces

### Purpose of processing

GForces processes the Personal Data listed above for the purposes of providing the Services to the Customer, including:

- To surface vehicle data to other NetDirector® products

### Nature of processing

- To surface vehicle data to other NetDirector® products

### Duration of processing

- For the Term of the Agreement, plus the period from expiry of the Term until deletion of Personal Data by GForces in accordance with the Data Processing Policy.

## Data transfers outside the EEA

GForces' wholly owned subsidiaries GForces Web Management FZ LLC (*UAE*) and GForces Vietnam Web Management Company Limited (*Vietnam*) provide various support and development services in respect of the Service, and it is sometimes necessary for employees of the subsidiaries to access Personal Data in order to provide those services. The Personal Data never leaves the EEA as part of this process. The data is accessed and processed via secure VPN access points. In order to ensure that such overseas access is compliant with the GDPR, GForces has entered into Standard Contractual Clauses which provide adequate safeguards for Personal Data, and enforceable rights and remedies for data subjects.

There are no other transfers outside the EEA unless Customer has instructed GForces to send data to a third party outside of the EEA.

**G F O R C E S**

**Subprocessors**

**All customers**

- Amazon Web Services, Inc. (*cloud platform provider*)
- GForces Web Management FZ LLC (*wholly owned subsidiary, Access only*)
- GForces Vietnam Web Management Company Limited (*wholly owned subsidiary, access Only*)

**Data transfers to third parties engaged by Customer**

None

# Elements of personal data included within each data type

Category Number	Type	Elements
1	Personal Information	<ul style="list-style-type: none"> <li>• First Name or initial</li> <li>• Full name</li> <li>• Last Name or initial</li> <li>• Date of Birth</li> <li>• Place of Birth</li> <li>• Full Home Address</li> <li>• Post Code</li> <li>• Marital Status</li> <li>• Telephone numbers, including mobile, business, and personal numbers</li> <li>• Passport Number</li> <li>• Driver's License number</li> <li>• Residence and geographic records</li> <li>• Next of Kin Details</li> <li>• Government Issued ID card</li> </ul>
2	Digital footprint	<ul style="list-style-type: none"> <li>• Unique device identifier (e.g. mobile device identifier iPad, iPhone)</li> <li>• IP Address</li> <li>• Email address or other online contact information</li> <li>• A persistent identifier (e.g. unique customer number in a cookie)</li> <li>• Login name, screen name, nickname, or handle</li> <li>• Geo-Tracking Data, Location-based services</li> <li>• Application/Website Usage, Device/Operating System/Browser Information and/or Customer Behaviour (<i>Application Logs</i>)</li> <li>• Passwords/ Authentication pins or codes</li> <li>• Geo Location Data</li> <li>• Secret questions</li> <li>• Secret questions answers</li> <li>• Digitized or electronic signatures</li> </ul>
3	Medical or Health Data	<ul style="list-style-type: none"> <li>• NHS Number</li> <li>• Sick Days</li> <li>• Information about Sick Leave</li> <li>• Doctor's Visits</li> <li>• Biological traits, such as genetic material</li> <li>• Fitness Data</li> <li>• X-rays, fingerprints, or other biometric image or template data (e.g., retina scan, voice signature, facial geometry)</li> <li>• Medication</li> <li>• Information about health plans, beneficiaries, etc.</li> <li>• Images from Medical systems, photographs or laboratory testing results</li> <li>• Medical records, include diagnosis and disease information, Medical procedures performed, treatments received, dates of services, etc.</li> </ul>



4	Biographical data	<ul style="list-style-type: none"> <li>• Age, if specific</li> <li>• Photographic image (<i>especially of face or other distinguishing characteristic</i>)</li> <li>• Gender</li> <li>• Hair Colour</li> <li>• Defining Characteristics</li> <li>• Eye Colour</li> <li>• Height</li> <li>• Weight</li> </ul>
5	Employment data	<ul style="list-style-type: none"> <li>• NI Number</li> <li>• Working Hours / Time Tracking</li> <li>• Salary Information</li> <li>• Job Position</li> <li>• School, College, University, Workplace Names &amp; Addresses</li> <li>• Certificates / Testimonials</li> <li>• Assessments / References</li> <li>• Performance / Appraisals</li> <li>• Tax Information</li> <li>• Education Information, including grades</li> </ul>
6	Financial information	<ul style="list-style-type: none"> <li>• Financial Accounts, institutions and transactions</li> <li>• Bank Information</li> <li>• Credit Card Numbers (<i>especially Personal Credit Cards</i>) Spending Habits, Transaction History, Debt Information Credit Score</li> <li>• Pension details</li> <li>• Account number(s)</li> <li>• Bank Account, routing or other electronic payment information</li> <li>• Credit reports or other information used to determine Credit worthiness</li> <li>• Earnings information, tax returns, bank statements, and other information about assets</li> <li>• Credit or payment history, outstanding loan/lease balances, loan/lease terms, account standing</li> </ul>
7	Special categories	<ul style="list-style-type: none"> <li>• Political opinions</li> <li>• Religious or other similar beliefs Membership of trade unions</li> <li>• Physical or mental health or condition Sexual life</li> <li>• Convictions, proceedings and criminal acts Ethnicity/Race</li> <li>• Biometrics</li> </ul>
8	Payment Card Industry Data (PCI)	<ul style="list-style-type: none"> <li>• Full Primary Account Number (PAN) Service code</li> <li>• Expiration date</li> <li>• Full Magnetic Stripe Data</li> <li>• CAV2 / CVC2 / CW / CVV2 / CID PIN / PIN Block</li> </ul>
9	Other	<ul style="list-style-type: none"> <li>• Any other</li> </ul>

G F O R C E S