

Privacy Policy

GDPR

GDPR001

October 2026 v2.6

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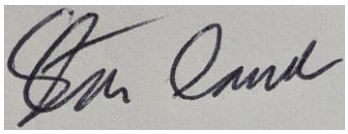
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1. Approval

Date of Initial Published Version: 7th June 2021

Name and Title of Approver: **Stephen Remde CTO**



Date of Approval (this version): 20th October 2026

Classification: Public

2. Revision History

The following revisions have been made since initial publication:

Revision Date	List of Changes	Author	Approval
V1.0 7th June 2021	Yearly Revision	ITM	CTO
V2 8th March 2022	Yearly Revision	GDPR Local	
V2.1 15th March 2022	Reformatted for publication. Redesignated GDPR001	SHEQ	CTO
V2.2 7th March 2023	Annual Review New Corporate format applied. ISO27001 classification applied. Section 4 updated.	SHEQ	CTO
V2.3 6th June 2023	Section 8 updated.	SHEQ	CTO
V2.4 1st October 2024	Annual Review No material changes required.	SHEQ	CTO
V2.5 24th July 2025	Annual Review Sections 3, 7, 12 and 15 updated re the use of AI.	SHEQ	CTO
V2.6 20th October 2026	Section 1 updated. Section 4 updated. Section 9 updated. Section 18 updated.	SHEQ	CTO

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3. Privacy Policy Summary:

This Privacy Policy ("Policy") explains how your information is collected, used and disclosed by Gaist Solutions Limited ("Gaist" or "We" or "Us" or "our"). This policy applies where we are acting as a Data Controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

This Privacy Policy is intended to assist you in making informed decisions when using the Site and our Services and/or to understand how your personal information may be processed. It will inform you of the nature of your personal information that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

To enhance data privacy and protection, we may use automated systems and artificial intelligence (AI) to process data. This can include, but is not limited to, the use of AI for the purpose of identifying and redacting (blacking out or blurring) personally identifiable information (PII), such as faces and vehicle registration numbers, from the video and photographic images captured during our survey work. This process is undertaken as a security measure to further protect individual privacy.

We are committed to safeguarding the privacy of our website visitors and service users. We will never sell, share, or use your personal information other than as described here.

By using our website and agreeing to this Policy, you consent to our use of cookies in accordance with the terms of this Policy.

Who will use my data?	**Gaist Solutions Limited**
What for?	Gaist Solutions limited is an Infrastructure Survey and Asset Management company. We will store and process your data in order to allow us to provide our services to our customers, manage our employees, work with our suppliers and other third parties, and operate our business. We will also send any relevant details to authorities, when there is a legal obligation to do so.
What will happen if I contact you?	If you contact us as a potential customer, we will use your information to send you the information you have requested and updates, offers and other information that we think you will be interested in. If you contact us for any other reason, we will use your details to respond to your enquiry and meet any legal obligations.

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What data will be stored?	We will store only the details necessary to provide our services to our customers and operate our business. We store large amounts of video images, but Gaist Solutions Ltd does not process the images of people, or other potentially identifying information that is captured as a result of our survey work. All data is stored in the UK on our secure, dedicated servers. * It has been established that video and other images are not classed as personal data since no processing is carried out and this data does not relate to any individual. In addition to the specific purposes for which we may store and process your personal data, we may do so where necessary for compliance with a legal obligation of for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court-procedure. Moreover, we may store and process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice.
What data will be shared?	We will not share your data with any third parties other than as described here. We will share your information with any regulator or legal body that requests it.
How long?	As an employee, customer, supplier or other third party your data will be stored for up to 7 years after the end of our relationship, after which time, it will be deleted. We store video images permanently. Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
Who can access my data?	We will never sell, share or otherwise distribute your data to any other third party other than as required to provide our services to our customers and to operate our business.
How is my data kept secure?	We will store your data on secure, dedicated UK based servers. We use industry standard security technology to secure data.

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3.1 About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Gaist Solutions Limited. The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously; this document describes our approach to data protection. This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Other loss and damage to Gaist Solutions Ltd, our partners, third parties, and data subjects as a result of a data breach or other data issue.

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4. Who We Are and How to Contact us:

Our website is owned and operated by Gaist Solutions Limited.

We are registered in the UK with registration number: 06905411 and also with the Information Commissioner's Office.

You can contact us in any of the following ways:

- Email: privacy@gaist.co.uk
- Phone: +44 1535 280066
- Website: https://www.gaist.co.uk/
- Post: Unit 5, Ghyll Way, Skipton, BD23 2TZ

5. Who this Privacy Policy Applies to:

Gaist Solutions Ltd. is an Infrastructure Survey and Asset Management company. This policy relates to customers, employees, website visitors, third parties, and other data subjects that share their data with Gaist Solutions Limited. Collection, processing, and storing of personal data is required in order to operate our business.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Postal addresses
- Email Addresses
- Telephone numbers
- Company / employment information
- Video / photos of individuals captured as a result of our condition surveying work
- Any other information relating to individuals

Where we collect your image [video, photograph or other media] as a result of our surveying work we do not store or process in any way that relates to you as an individual. We will respect your rights under GDPR as far as reasonably practical and technically possible. It has been established that video and other images are not classed as personal data since no processing is carried out and this data does not relate to any individual.

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6. What this Privacy Policy Applies to:

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- Information you provide when contacting us about using our Infrastructure Survey and Asset Management services
- When you contact us in order to discuss using these services
- Information we collect about how you use the website
- Information relating to products and services we offer to you and other transactions including financial and other personal information required to complete these transactions
- Information given and stored as part of our ongoing relationship
- Information / images we capture as a result of our surveying work

We do not collect or process sensitive data about you other than where is absolutely necessary such as for employment purposes.

7. How Your Information Will be Used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity, (b) Contact	Performance of a contract with you
To process and deliver the products and services you request including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us, (c) Necessary to operate our business
To manage our ongoing relationship with you which will include notifying you about changes to our terms, products and services, or privacy policy, to maintain our records	(a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services

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To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy. To help target our social media campaigns.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To conduct our infrastructure surveying work. This involves capturing video and photographic images of roads, which may inadvertently include images of people, vehicle registration numbers, or other data that could be personally identifiable. To enhance privacy, we may use automated systems, including artificial intelligence (AI), to identify and redact such personally identifiable information from our imagery	(a) Identity [video, photo, other images of people, cars, and other identifiable items]	Necessary for our legitimate interest to run our business and provide our products and services to our customers. * It has been established that video and other images are not classed as personal data since no processing is carried out and this data does not relate to any individual.

As a customer, employee, supplier, or other third party may collect and process information about you, including your name, date of birth, address, contact details (including email address and mobile phone number), product and service details, purchase history and data collected as part of any contract. We may take personal information from:

- Information that you provide to us when contacting us via our website

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(including your email address)

- Information that you provide to us when signing up to any distribution lists to receive correspondence from us
- Information relating to the services we provide to you
- Information we collect as a result of our surveying and related activities
- Information from all other sources including social media, agencies, other companies

Personal data we receive will be used for the purposes it was provided, including:

- To respond to queries from you regarding our services
- To carry out our obligations arising from any contracts entered into between you and us including provision of services, and to respond to queries from you regarding those contracts
- To manage and administer the relationships between you and us
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us
- To obtain feedback from you regarding our services
- To manage our business and our relationship with you as an employee, customer, supplier, or other third party.

If you contact us as a potential customer, and according to your preferences, we will use your personal information to provide you with information about products and services that may be of interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services updates, including communications in relation to any services you use or changes to how we operate.

Where we inadvertently collect your image [video, photograph or other media] as a result of our surveying work we do not store or process in any way that relates to you as an individual. We will respect your rights under GDPR as far as reasonably practical and technically possible.

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8. Our use of CCTV Cameras

We use a fleet of modified vehicles, with CCTV cameras installed on the top of the vehicles to capture photos of road surfaces. Everything we aim to capture is related to physical infrastructure and the roadscape.

Our CCTV system is not designed to process the images of people or number plates and there are no functions provided within the system to allow accidental processing of these images. Location information is collected along with the photo content, but no other contextual information is collected, processed, or stored. We have determined that these images do not constitute personal data and the data collected does not relate to an individual in any way.

9. How to Change Your Preferences

We operate in line with EU GDPR data protection guidelines. Whether we collect, store, and process your data as a customer, employee, supplier, website visitor, other third-party or as a result of our surveying operation we respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made to privacy@gaist.co.uk or you can visit our website, or call, to contact us to change your preferences at any time.

10. Scope of Agreement

By contacting us as a customer, supplier, employee, or other third party and submitting your personal data on this site or by supplying your data as required for us to provide products and services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document.

We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about goods and services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

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11. Opting Out at a Later Date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at any time. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

12. How We Store and Process Your Data

Your data will be collected, stored and processed in the UK only, we do not transfer your data outside the EU. Your data will be stored for up to 7 years to ensure we have records of service, payments, and other interactions we have with you.

Images [videos and photography] captured as a result of our surveying work may be transferred outside the EEA for processing. Where this is the case, we will ensure that appropriate technical and organisational safeguards are in place to protect this data. This processing may include the use of artificial intelligence (AI) tools to automatically detect and redact personally identifiable information, such as faces and registration numbers, as a key privacy and security measure. When transferring data, we shall make use of legally-recognized data transfer mechanisms, which may include the European Commission's standard contractual clauses, the UK Addendum to the SCCs, binding corporate rules for transfers to data processors, or other appropriate legal mechanisms to safeguard the transfer. However, it has been established that video and other images are not classed as personal data since no processing is carried out and this data does not relate to any individual.

In order to provide our services to you we use recognised third parties to take payment, conduct credit reports and other checks, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU. If this is the case, we will ensure precautions are in place to protect your data in rest and migration.

These third parties may operate outside the UK. 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 you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. 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 of processing.

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We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

You will only receive marketing communications from us if you have:

- Requested information from us or purchased goods or services from us
- If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

13. Our Obligations

We are a Data Controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for these purposes
- We will take steps to ensure your data is accurate and rectify data as necessary

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.

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- Request transfer of your personal data.
- Right to withdraw consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. Third Parties

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Third parties who provide advertising and marketing services.
- Websites including social media we use to advertise our products and services
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- Couriers or other parties necessary to provide our products and services to you.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third

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parties to process your personal data for specified purposes and in accordance with our instructions.

Images [videos and photography] captured as a result of our surveying work may be transferred outside the EU for processing. Where this is the case, we will ensure appropriate controls are in place to protect this data. However, it has been established that video and other images are not classed as personal data since no processing is carried out and this data does not relate to any individual.

15. Security

We have put 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. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. As part of these security measures, we may utilise automated technologies, such as artificial intelligence, to systematically identify and redact personal data that may have been inadvertently captured in our survey imagery.

When we share your data with any third parties, we will take reasonable precautions to ensure that your data is protected including ensuring that any third party is GDPR compliant.

We will report any breaches or potential breaches to the appropriate authorities within 72 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This website 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 website, we encourage you to read the privacy notice of every website you visit.

16. Cookies

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 operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website 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.

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 the 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. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept, then you are free to leave our website, at any time.

17. Legitimate Interests and DPIA

We have conducted a Legitimate Interest Assessment and Data Protection Impact Assessment to establish whether Images [videos and photography] captured as a result of our surveying work are classed as personal data since no processing is carried out and this data does not relate to any individual. It has been determined that these images do not relate to any individual and are not processed in any way which would allow an individual to be identified. As such these images are not classes as personal data.

Under the GDPR, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).

18. Exercising Your Information Rights and Complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact privacy@gaist.co.uk. We will process data subject requests within 30 days. Subject Access Requests responses are usually free but we reserve the right to charge for excessive, repetitive, or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

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Note that we are not able to identify individuals from the video and photographic images captured as a result of our survey work. We will respond to any SAR accordingly.

If you remain dissatisfied you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk