



# PRIVACY POLICY – GDPR & DATA PROTECTION PROCEDURE

## Statement of Policy

Global Energy Solutions Ltd incorporating Global Project Services Ltd is committed to protecting the privacy and security of personal data. We collect, use, store, and process personal information responsibly, lawfully, and transparently, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Privacy Policy explains how we handle personal data, the rights of individuals, and the measures we take to safeguard information entrusted to us.

## Who is this privacy policy aimed at?

This privacy policy is aimed at all entities who interact with GES / GPS which includes employees, workers, customers, suppliers, visitors, and website users.

This engagement may be in respect of:

- Personnel and workers (whether employed directly or not)
  - o When you apply to work for or provide services to us.
  - o When you become an employee.
  - o When you provide subcontractor services.
- Customers who may:
  - o Enquire regarding our products and services.
  - o Ask us to tender for work.
  - o Buy or use our products and services.
  - o Subscribe to newsletters or alerts from us.
  - o Where your information is available publicly.
- Suppliers who:
  - o Supply products and/or services to us.
  - o We have approached a supplier for a quote for work.
- Visitors:
  - o Attending or planning to attend our worksites or business premises.
- Website users who interact with our website.

## Data Processing

- As a responsible business GES / GPS will be a data controller in respect of making decisions about what information is collected about you and maintain records in relation to your service or provision.
- As a data controller, we must comply with the data protection legislation and relevant guidance when handling your personal information.
- To the extent relevant to our practice, you can expect GES / GPS, all its employees, managers, and directors to handle your personal data information in accordance with This Privacy Notice and our **GDPR & Data Protection Procedure**. This means that whenever we use your personal data, we will only do so as set out by our legal obligations.
- Please be aware that GES / GPS management may process your personal information at a non- GES / GPS venue or site.
- If you have any concerns about the way GES / GPS has handled your personal information, please contact the DPO whose details are provided at the end of this document.

## We will only process data under the following conditions:

For further description of the categories as described above, please refer to GES / GPS' **GDPR & Data Protection Procedure**. We maintain an **Information Asset Register** that provides full details of the information we collect and an assessment of how we process and protect it.

LO	Compliance with a legal obligation
CP	Contractual performance
VI	Vital interests
PI & OPA	Public interest or acting under official public authority
LI	Legitimate interests
DSC	Data Subject Consent



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## What we use it for

GES / GPS collects data for the purposes of running a professional and legitimate business and to enable us to provide our customers with the products and services they have requested. The data we collect is used for:

- Recording of accurate information for employment and financial reporting purposes.
- To verify competencies to work for or provide a service to GES / GPS.
- To enable maintenance of company business relationships and increase its operational value.
- To maintain our approved supplier database.
- To ensure that we can provide a list of persons on site/on project sites in the event of an emergency so that in the event of an emergency, the project team can refer to emergency contact information quickly.
- We use data collected for internal monitoring and review of management systems.
- To make improvements to the products and services we offer to customers.

## Sharing of information

The data controller will define the purpose of the data requirement and categorise this within the lawful and permitted scopes defined for the sharing of data under UK Data Protection Act and, if appropriate, EU General Data Protection Regulations. Where this cannot be met compliantly, data sharing will not be permitted.

We do not share data nor sell data for marketing mailing lists. We may share supplier organisation details as a recommendation with other selected professionals working with or alongside GES / GPS. If you would prefer us to not share your organisations details, please ensure you contact our DPO.

Data will be shared accordingly appropriate to the sensitivity of the contents and in line with GES / GPS protocols and the **Information Asset Register Assessment**.

When sharing data, will always ensure that:

- We verify the recipient's identity and validate their reason for requiring the data is legitimate prior to transmission.
- We check that the data we hold is current, accurate and relevant to the reason for its processing.
- We check that any data transmitted matches only the necessary data as is required with volume being minimised as much as is practical and possible.
- Data will only be shared over a secure platform and in a format that is unamendable.
- We will verify the recipient's information prior to transmission.

	Phone	Information, where transmitted over the phone, the recipient's identity must be verified, their reasons for requiring the information must be validated to be legitimate.
	Online Services	Information transmitted via online portals or services must be secure and encrypted and entered by authorised persons only under supervision of the DPO.
	Face to Face	Information should only be provided where approved by the DPO and in accordance with our documented protocols.
	Verified Email	Use a secure and encrypted email server to send and receive information.
	Letter	Unsecure methods of posting are permitted where sensitive or personal data is not enclosed.
	Secure Letter	For transmission of sensitive or personal data, where a postal service is used, we will ensure that adequate tracking of the shipment is applied.



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## Protection and storage of information

GES / GPS stores data in the following ways:

- Electronically on company PCs, laptops, and mobile devices.
- On secure encrypted email servers.
- On our cloud-based CRM system.
- On our accounting software.
- Using Drop Box, One Drive and SharePoint.
- In paper form:
  - At the project work site or at the company registered office address.
  - In files used for accountancy/financial reporting evidence.

	PC/laptop		Mobile phone		Documents
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- We have implemented access controls to our information technology.
- We have applied appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, and offices.
- Electronically stored data containing personally identifiable information is stored under files which are password protected.
- Our PCs, laptops and mobile devices are password protected. PCs and laptops are secured against malware, viruses and spyware, and are backed up regularly to prevent loss of data.
- Information stored on our devices is only accessible by relevant company officials with legitimate purposes to view.
- Our employees are subject to strict confidentiality agreements through restrictive covenants signed at the time of employment.
- Data stored on the company officials mobile phone devices is subject to strict access controls.
- We limit access to our buildings to those that we believe are entitled to be there (by use of passes, key card access and other related technologies).
- Information collected on paper or by using paper forms is regularly uploaded to an electronic format and stored on the organisations IT systems.
- Confidential paper waste is stored in locked confidential receptacles awaiting shredding prior to disposal.
- Paper files relating to financial accountancy matters are kept at the companies registered office address.
- Offices are always secured when unmanned.
- We always ensure that only authorised persons who have a legitimate reason for access (which we will validate and verify) are permitted to have access to personal or sensitive data.
- We ensure that we dispose of personal data after its retention period in a responsible and irretrievable manner.

## Other authorities and legal and statutory disclosures

We are bound by law to provide certain personal information with government authorities on their request. This may be entities such as HMRC, HSE, Customs and Excise, lawyers, Child Maintenance service etc. GES / GPS will verify the source of any request made for personal information by any legal authority prior to subjecting any information. We will also gain the consent of the persons where appropriate before providing data.

## Website

GES / GPS has a dedicated privacy policy available on our website.

GES / GPS collects and processes data from enquiries made for our products and services via our website contact form. When a contact form is submitted, an email is received by us providing the customer submitted contact information. Information submitted is made available to our employees for the purpose of dealing with enquiries and make available our products and services. We also collect analytic data information from our webhost. Information gathered may include information on users including behaviours, devices, language, geographical areas (country only), site journey and click/viewing preferences are used to enable us to improve our users experience, help us identify our target audience and increase website visibility, marketing opportunities and ease of use.

Where we may advertise employee information on our website, we will have express consent from the person to do so.

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## Children

We do not employ, subcontract, nor store details of children, or under 18s or offer services to those requiring parental permissions for consent.

## Your Rights

- Rights to correct personal data - everyone has the right to have the information held about you corrected if it is not accurate. To correct inaccurate data, you will need to put this in writing directly to the responsible person/DPO
- Right to access personal data - everyone has the right to request the personal data that GES / GPS holds for you. To make this request please put this in writing to the responsible person/DPO. We will respond to your request within 30 days of receipt of your request. We do not charge to provide this information.
- Right to object to or restrict the use of your personal data – everyone has the right to object to or restrict GES / GPS processing your personal information. To notify us of your objection, or restriction please put this in writing to the responsible Person/DPO.
- Right to erase your personal data – Everyone has the right to request the erasing of your personal data from GES / GPS information. To notify us of your request to erase, please put this in writing to the responsible person/DPO.
- Right to be informed - If your personal data is subject to unauthorised access, you will be informed to the extent and scope. The company will undertake a full investigation into the breach and as appropriate the ICO will be notified.
- Right not to be subject to automated decision-making including profiling - automated decisions will not be made based on personal data and will always be subject to human interaction.
- Right to portability - you have the right to take with you the personal data you have provided to us, this allows you to obtain and reuse personal data for your own purposes across different services.

## Contact Details for the Data Protection Officer/Responsible Person

The Data Protection Officer ("DPO") helps ensure that GES / GPS complies with data protection law. Our DPO has responsibility for data protection to ensure compliance.

GES / GPS Responsible Person/DPO is Ross Thomson (Managing Director)

Please put your request in writing to Global Energy Solutions Ltd, Service Base, Shore Road, Invergordon, Scotland, IV18 0EX

## Authorisation and Approval

Signed on behalf of Global Energy Solutions Ltd by

Ross Thomson  
Managing Director

Date: 01/03/2026

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