

Privacy Policy

GB Advisory Services Ltd.

Effective Date: February 2026

1. Introduction

GB Advisory Services Ltd. (“GB Advisory”, “we”, “us”, “our”) is committed to protecting and respecting your privacy.

This Privacy Policy explains how we collect, use, store, and protect personal data when you:

- Visit our website
- Contact us
- Engage us to provide administrative, billing, reconciliation, and settlement coordination services
- Interact with us in the course of commercial relationships

GB Advisory Services Ltd. acts as a **data controller** in relation to personal data processed through our website and business operations.

2. Who We Are

Company Name: GB Advisory Services Ltd.

Registered in: England & Wales

Registered Office: Ashen Coppice, Peterstow, Ross-on-Wye, HR9 6LJ, United Kingdom.

Contact Email: enquiries@gbasl.co.uk

We provide administrative and settlement coordination services to affiliated operating companies. We do **not** provide regulated payment services, money transmission, deposit-taking, wallet services, or custodial services.

3. Legal Framework

We process personal data in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018

- Applicable UK financial compliance and tax legislation

Where applicable, we align our practices with recognised regulatory standards relating to AML, KYC, and corporate governance.

4. Personal Data We Collect

We may collect and process the following categories of personal data:

4.1 Website Visitors

- Name and contact details (if submitted via enquiry form)
- IP address
- Browser and device information
- Cookies and analytics data

4.2 Business Contacts & Clients

- Name
- Business contact details
- Job title and company details
- Communications and correspondence
- Contractual and billing information

4.3 Compliance & Due Diligence Data

Where required for regulatory or commercial due diligence purposes:

- Identity verification information
- Corporate documentation
- AML/KYC screening data

We do not intentionally collect sensitive personal data unless legally required.

5. Payments and Financial Information

GB Advisory Services Ltd. does **not** operate as a payment institution.

Customer payments are processed and safeguarded by independent, FCA-authorised third-party Payment Service Providers (PSPs), including Stripe.

Where payments are made in connection with services provided by affiliated operating companies:

- Payment card and financial details are processed directly within the regulated PSP environment.
- GB Advisory does not access or store full payment card details.
- Funds remain within the PSP's safeguarded environment pending settlement and any applicable dispute or clearance period.

We process only the minimum financial information necessary for reconciliation, reporting, and accounting purposes.

6. How We Use Personal Data

We use personal data to:

- Respond to enquiries
- Deliver contracted administrative and advisory services
- Perform billing and reconciliation activities
- Coordinate settlement processes
- Maintain internal financial records
- Comply with AML, KYC, and regulatory obligations
- Comply with UK tax and accounting requirements
- Prevent fraud and manage disputes
- Improve our website and services

We do not sell personal data.

7. Lawful Bases for Processing

Under UK GDPR, we rely on one or more of the following lawful bases:

- **Contract** – to perform contractual obligations
 - **Legal Obligation** – including tax, accounting, AML, and regulatory requirements
 - **Legitimate Interests** – to operate and improve our business
 - **Consent** – where specifically obtained (e.g., marketing communications)
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8. Sharing of Personal Data

We may share personal data with:

- FCA-authorized Payment Service Providers
- Affiliated operating companies (where relevant to service delivery)
- Professional advisers (legal, accounting, compliance)
- Regulators or government authorities where legally required
- IT and hosting providers

All third parties are required to process data securely and in accordance with applicable law.

9. International Transfers

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place, including:

- UK International Data Transfer Agreements (IDTAs)
 - Standard contractual clauses
 - Secure processing environments
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10. Data Retention

We retain personal data only for as long as necessary for:

- Contractual performance
- Statutory accounting and tax requirements
- AML and regulatory record-keeping obligations
- Dispute resolution

Financial and tax-related records are retained in line with HMRC requirements (typically a minimum of six years).

Retention periods are reviewed periodically.

11. Data Security

We implement appropriate technical and organisational measures, including:

- Secure cloud-based systems
 - Restricted access controls
 - Encryption where appropriate
 - Role-based data access
 - Regular review of data handling procedures
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12. Your Rights

Under UK GDPR, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict or object to processing
- Data portability (where applicable)
- Withdraw consent (where processing is based on consent)

Requests can be made by contacting us using the details above.

You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO).

13. Cookies

Our website uses cookies and similar technologies to:

- Ensure proper website functionality
- Analyse traffic and usage patterns
- Improve user experience

Further information is available in our Cookie Policy.

14. Changes to This Policy

We may update this Privacy Policy periodically. The latest version will always be available on our website.

Approved by: The Directors of GB Advisory Services Ltd.