

The Market People Data protection security and GDPR compliance policy

GDPR compliance:

The market people platform was built with the highest ethics regarding data handling and data protection. We are welcoming the GDPR legislation designed to protect the internet users and their privacy. Due to our strict data protection policy, other than publishing this document, no intervention or changes were necessary, to the architecture of the website or the way we are handling data, for The Market People platform to be GDPR compliant.

As general rules we do not disseminate data to third parties, it is the user who decides who can access their data. We have compiled this document for you to understand whom you are sharing your data with and who can access your data when you are using The Market People website nd interacting with third parties.

To understand the GDPR, it is important to differentiate private data, individual professional data and business data.

Personal private data:

In exception of the name, surname and photo of an individual (traders), these data are not shared with third parties; they are only used internally to identify the user or to meet the legal requirements. These data fall under GDPR regulations.

Individual professional data:

These data are the professional contact details <u>of an individual</u> in his working environment. They include the name and surname of a person. For example the contact details of a local authority officer. These data fall under GDPR regulations.

Professional business data:

Professional data are the data and contact details related to a business or an organisation, and may include details related to a transaction; **these data do not fall under GDPR regulation**

Who can access data

Data are strictly shared for the good functionality of the service we are providing to the users.

There is four type of user that can access data on our platform: The public, the market operators, local authority officers and traders. We do not share sell or give access to your data to anyone other than necessary for the functionality of the website.



Type of data shared and in which circumstance:

Trader and assistant trader Personal data:

The only personal data shared are **the trader name**, **surname and photo**, these data are shared with an operator whom you are interacting with (when applying, confirming a booking...), and with relevant local authority officers when trading under their jurisdiction.

While the market pass prevents identity theft and breach of personal data privacy we must provide local authority and relevant government agency with "all the trader private details" when specifically requested by the local authority and government officers. In this eventuality, the traders are informed that such request has been made and by which local authority.

Trader Professional business data:

The contact details related to a business, including a sole trader's business are shared with:

- The public **only if the trader chooses to do so**.
- The operator when submitting an application or conducting a transaction
- The relevant local authority and government officers when trading activities are taking or have taken place under their jurisdiction.

Important notification for sole traders: Many sole traders are using their personal contact details for their business. The Market People does not recognise the data entered in "professional details" section as personal details. It is the user who willingly chooses to use his personal contact details as his professional business contact details.

Operator and operator's staff personal professional data:

Shared operator personal data are: Name, Surname photo and individual professional contact details

Shared Staff individual professional data are: Name, Surname, Photo, and professional contact details. They are only shared with registered traders and relevant local authority officers if the operator wishes to do so.

Operator business professional data are shared with

- All registered trader and registered local authority
- The public when they choose to do so.

Local Authority individual officer contact details are shared with:

- Other local authority officers when submitting a report
- Trader and operator only if the officer chooses to do so
- The relevant individual traders (on the inspection report)

Government, Local authority and public service department data:

 Contact details of the government's department, public services and local authority's department are shared with trader and operator.



Recording and sharing policy of data related to activity and transaction between users

The transactions between traders and operators:

In the Market People website, all the data related to a transaction between trader and operator, including applications, invoices, credit notes, receipts, booking cancellation, payment, are shared and solely shared between the parties involved..

Local authority reports:

These data are only shared between officers from the same department and related government agency and the subject of the report. For example an HEO report is only shared with their superiors, other HEO officers, and the inspected trader.

Operator staff audit:

The market people record all sensitive staff activities, to provide the operator with security and relevant audit trials related to finance, application/booking procedures, and best practice policy.

Notification settings and automated email

Each account holder can customise the automated notification setting. A link to modify these setting is provided in every automated email or accessible from the user account, after login, by clicking on their profile name on the top right corner of the screen.

Please note Email related to transaction can't be turned off.

Closure of account and request of data removal

When closing your account, all the personal contact details are removed from the database

The data related to your business are no longer available to the public stall profile are removed, and business profile are removed from the database. However, any data related to a transaction or interaction between two parties, such as booking history, bookkeeping, official reports... are kept and solely available to the parties involved in these transactions and interactions, for a period of 6 years starting at the time of the last transaction recorded.

However, you will not have access to your account after closing it. We recommend that you print or keep a record of all the invoice and transaction details when closing your account.



Important notification to the market operators and traders

When a trader interacts with an operator through the market people website, the trader permits the operator to record the trader's business data. However, the operator agrees not to sell, share the trader's data collected through the market people to any third party without the trader consent. As data handler on behalf of traders and operators, we have the legal duty to report any user breaching our privacy policy and the GDPR regulations.

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