## **GDPR Systems Ltd**

August 2025

## Our reasons for processing your personal data, including our lawful basis for doing so under UK GDPR

Where does the data come from?	What do we call it?	Why do we use it (purpose)?	What data is processed?	Lawful basis for processing?	What special category data is processed?	What is our (Article 9) justification for using the data?	How long do we keep the data for?	How do we delete the data at the end of the retention period?
All clients and prospects	Client emails	Communica tion with clients, prospects and business partners	Email Address, Name	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamenta I rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child			max 2 years	delete
New clients	Client Contracts	Communica tion	Email Address, Name, Physical Address	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden			max 2 years	delete

				by the			
				interests or			
				fundamenta I rights and			
				freedoms of			
				the data			
				subject			
				which			
				require			
				protection			
				of personal			
				data, in			
				particular where the			
				data subject			
				is a child			
New clients	Client	Set up	Email	Processing		max 2 years	delete
	Contracts	portal	Address,	is necessary		post	
		access	Name,	for the		contract	
			Physical	purposes of			
			Address	the			
				legitimate interests			
				pursued by			
				the			
				controller			
				or by a third			
				party,			
				except			
				where such			
				interests			
				are overridden			
				by the			
				interests or			
				fundamenta			
				I rights and			
				freedoms of			
				the data			
				subject which			
				require			
				protection			
				of personal			
				data, in			
				particular			
				where the			
				data subject			
franchisors	Franchisee	Communica	Email	is a child Processing		max 2 years	delete
ii aiiciiisUi S	Details	tion	Address,	is necessary		11101 Z YCOIS	ucicle
	From		Landline	for the			
	Franchisor		Telephone	purposes of			
			Number,	the			
			Mobile	legitimate			
			Telephone	interests			
			Number,	pursued by			
			Name, Physical	the controller			
			Address	or by a third			
			, (44) (33	party,			
				except			
				where such			
				interests			
				are			

franchisors	Franchisee Details From Franchisor	Storage of client data and any info put into web portal	Email Address, Landline Telephone Number, Mobile Telephone Number,	overridden by the interests or fundamenta I rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child  Processing is necessary for the purposes of the legitimate interests pursued by		12 months post contract with the franchisor unless a new contract is	delete where possible and anonymise if can't delete
			Name, Physical Address	the controller or by a third party, except where such interests are overridden by the interests or fundamenta I rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child		taken up by the franchisee	
franchisors	Franchisee Details From Franchisor	To create progress manageme nt sheet	Email Address, Landline Telephone Number, Mobile Telephone Number, Name, Physical Address	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests		12 months post contract with the franchisor	delete

				are overridden by the interests or fundamenta I rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child			
franchisors	Franchisee Details From Franchisor	To set up login for franchisees	Email Address, Landline Telephone Number, Mobile Telephone Number, Name, Physical Address	is a clinu		max 2 years post contract	delete
Calendly (from clients)	Session bookings	Session Booking	Email Address, Landline Telephone Number, Mobile Telephone Number, Name, Physical Address	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamenta I rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child		duration of contract	delete
Calendly (from	Session bookings	Session Booking	Email Address,	Processing is necessary		max 2 years	delete
clients)		Confirmatio	Landline	for the			

clients, All Database Email Processing 12 months delete	Calendly (from clients)	Session bookings	Session booking video call and screen sharing	Telephone Number, Mobile Telephone Number, Name, Physical Address Landline Telephone Number, Mobile Telephone Number, Address	purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamenta I rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests are overridden by the interests are overridden by the interests or fundamenta I rights and freedoms of the data subject which require protection of personal data, in particular where the data subject		until the end of the call	auto deletes
franchisors, client/subsc backup in Address, is necessary post where	clients,	All	Database		where the data subject is a child		12 months	delete

franchisees, rib	ber details	case of system downtime/f ailure	Landline Telephone Number, Mobile Telephone Number, Name, Physical Address	for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamenta I rights and freedoms of the data subject which require protection of personal		contract with franchisor unless a new contract is undertaken by franchisee	possible/an onymise otherwise
•	l ient/subsc ber details	Enable use of all portals including log in resets	Email Address, Landline Telephone Number, Mobile Telephone Number, Number,			12 months post contract termination from client	delete