

# FAIR MARKETING AND SOCIAL MEDIAL POLICY

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### 1. Introduction

This policy is a summary of the Marketing and Social Media Practice followed by "GCL International Bulgaria" Ltd. that works in accordance with the rules of conduct by the Advertising Standard Agency and the Information Commissioners Office (ICO). Data protection is covered by our Security Policies and compliance maintained with the GDPR, (General Data Protection Regulations); the Business Protection from Misleading Marketing Regulations 2008; and the Advertising Standards Agency's Code of Non–broadcast Advertising and Direct & Promotional Marketing.

"GCL International Bulgaria" Ltd. uses Marketing and social media to communicate, promote and interact with customers and interested parties.

#### 2. Overview

In order to comply with the code of practice all marketing and advertising shall be:

- an accurate description of the product or service
- legal
- decent
- truthful
- honest
- socially responsible (not encouraging illegal, unsafe or anti-social behaviour)

"GCL International Bulgaria" Ltd. follows the rules set out in; The Business Protection from Misleading Marketing Regulations 2008 restrict what advertisers can and can't do. The ASA UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) is the rule book for non-broadcast advertisements, sales promotions and direct marketing communications (marketing communications).

### 3. Our Marketing Practice

In accordance with the rules of conduct, our business shall not:

- Make exaggerated claims that we cannot justify
- Cold call in person
- Cold call by telephone a person, unless they have 'opted in'
- Cold call by telephone where the person has stated they don't want to receive calls
- Send marketing by fax, email, or SMS text unless the recipient has 'opted in'

In the course of business, "GCL International Bulgaria" Ltd. has a website, namely www.gcl-intl.bg and in accordance with the rules our business shall include the following information on our website:

- Legal name (as it appears on any certificates)
- Geographical address



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- Email address
- Details of our business's complaints handling procedure
- · Registered office address
- Registration number
- · Country of registration

The website shall be regularly reviewed to ensure compliance and all amendments or changes go through an escalated authorisation process. The website, communications and business letters comply with all requirements.

"GCL International Bulgaria" Ltd. has a dedicated Management Representative responsible for Marketing, Social Media and Communications within the company and externally to the wider public. The Management Representative has a further responsibility to ensure all activity adheres to the rules of conduct, and it deals promptly and efficiently with any changes in legislation.

"GCL International Bulgaria" Ltd. uses Social Media such as a blog, Facebook, LinkedIn and Twitter to engage with customers and interested parties. We engage within these mediums, ensuring at all times that we comply with the rules of conduct. We monitor the use of social media and ensure that all posts (whether posted by "GCL International Bulgaria" Ltd. or others) are neither misleading, enticing, defamatory nor derogatory. Any posts of such nature are immediately removed and if necessary, escalated to our board and Impartiality Committee for further action.

When we are using Social Media to promote the company, we are mindful to ensure that it is done in a professional and factual manner which is neither misleading nor false.

All business letters and communications undergo regular review to ensure that they comply with the latest legislation and rules of conduct in addition to relevancy. Our policy complies with the Advertising Standards Agency CAP code.