



PRIVACY & COOKIE POLICY

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1. Important notice

We take your privacy seriously and use your personal data as explained below. The policy describes how we obtain and use your personal data, why we can do so by the law, who has access to your personal data and what your rights are. Please read it carefully.

You have the right to object to us processing your personal data for our legitimate business interests or for direct marketing purposes (including any related profiling). For more information about your rights and how you can exercise them, please see the section Your rights.

2. Personal Data we may collect and why

Personal data is any information which identifies you personally whether directly (for example, your name) or indirectly (for example, information about your use of our products and services).

We may collect the following data about you:

- **Contact details:** your name, email address, and telephone number so that we can contact you in response to an enquiry you make or in relation to the products and services that we provide to you;

- **Correspondence:** we collect any additional personal data you may provide to us if you contact us by email, letter or telephone or by any other means;

3. Cookies

What are Cookies?

Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a client and website and can be accessed either by the web server or the client computer. This allows the server to deliver a page tailored to a user, or the page itself can contain some script which is aware of the data in the cookie and so is able to carry information from one visit to the website to the next.

a. What cookies are used on this Website?

The cookies we use on our website are broadly grouped into the following categories:

- **Essential** – Some of the cookies on our website are essential for us to be able to provide you with a service you have requested. An example of this could be a cookie used to enable you to log into your account on our website or which allows communication between your browser and our website. Our cookie preference cookie described in the section “How can I reject or opt out of receiving cookies?” is also an essential cookie. You may not be able to use our website without these cookies.
- **Analytics** – We use analytics cookies to help us understand how users engage with our website. An example is counting the number of different people coming to our website or using a feature, rather than the total number of times the website or feature is used. Without this cookie, if you viewed our website once each week for three weeks we would count you as three separate users. We would find it difficult to analyse how well our website was performing and improve it without these cookies.

b. How can I reject or opt out of receiving cookies?

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you use our website. The “Help” menu of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. For more information about cookies and how to stop cookies being installed or how to delete existing cookies from your hard drive visit the following website: <http://www.allaboutcookies.org>.

c. Third party cookies

Some of the cookies described in the "What Cookies are used on our website" section above are stored on your machine by a third party when you use our website. Third parties may also read cookies on your browser to collect information or to serve content or

advertisements to you. We have no control over these cookies or how the third parties use them. They are used to allow that third party to provide a service to us, for example analytics. For more information on these cookies and how to disable them, please see:

- Internet Advertising Bureau website at <http://www.youronlinechoices.com/> where you will be able to opt-out of receiving Interest-Based Advertising cookies from some of the third parties listed below; and/or
- If you want to know more about how cookies work and how to manage or delete them, visit the [World Wide Web Consortium's website](#).

4. How we use your personal data

We use your personal data for the following purposes:

To provide you with the products and services you have requested

We use your personal data to accept you as a new or returning customer to provide you with the products and services you have requested.

To send you service communications, including in relation to changes

We use the contact details you have provided to us so that we can communicate with you about the products and services that we provide, including to let you know about major changes to those products and services or to any related information.

Direct marketing

If you have provided your consent or we otherwise have the right to do so, we may use your contact details to send you direct marketing and keep you informed of promotional offers by email, post or telephone relating to our products and services.

You can unsubscribe from our direct marketing at any time by clicking the “Unsubscribe” link in any of our emails or by contacting us.

To provide and improve customer support

We use your personal data to be able to provide and improve the customer support we provide to you (for example, where you have questions about our products and services).

To maintain our records and improve data accuracy

Like any business, we process personal data in the course of maintaining and administering our internal records. This includes processing your personal data to ensure that the information we hold about you is kept up to date and accurate.

To respond to enquiries, complaints and disputes

We use the personal data we hold about you to help us respond to any enquiries or complaints you have made, or deal with any dispute which may arise in the course of providing our products and services to you.

To investigate, detect and prevent fraud and comply with our legal obligations

In certain circumstances, we use your personal data only to the extent required to enable us to comply with our legal obligations, including for fraud detection, investigation and prevention purposes. This may require us to provide your personal data to law enforcement agencies if they request it.

5. Legal grounds for processing

Data protection law requires us to only process your personal data if we satisfy one or more legal grounds. These are set out in data protection law and we rely on a number of different grounds for the processing we carry out. These are as follows:

Consent

In certain circumstances, we process your personal data after obtaining your consent to do so for the purposes of:

- sending you marketing communications about our products and services;
- obtaining your credit score so that we can establish the best possible payment terms we are able to offer to you.

Necessary for the performance of a contract and to comply with our legal obligations

It is necessary for us to process your basic contact details, payment details and information about the business you represent for the performance of trading between us. We rely on this legal ground to:

- provide you with the products and services;
- communicate with you about the products and services that we provide to you, including to let you know about major changes to those products and services or to any related information;
- provide and improve customer support; and
- notify you about changes to our service.

If you choose not to give some or all of the aforementioned information to us, this may affect our ability to provide our products and services to you.

In certain circumstances, we also use your personal data only to the extent required to enable us to comply with our legal obligations, including to detect, investigate and prevent fraud.

Necessary for the purposes of our legitimate business interests or those of a third party

It is sometimes necessary to collect and use your personal data for the purposes of our legitimate interests as a business, which are to:

- provide you with products and services that are as useful and beneficial as possible, including by personalising our contact with you and making sure we tell you about all the offers that are relevant to you;
- better understand our customer base so that we can improve our products and services and marketing activities (which could also benefit you);
- comply with our contractual obligations to third parties;
- develop and improve our website to enhance the customer experience;
- train our staff so that we can provide you with a better customer service;
- respond to any enquiries or complaints you have made, or deal with any dispute which may arise during us providing our products and services to you; and
- to ensure that content from our website is presented in the most effective manner for you and for your computer;

- ensure effective operational management and internal administration of our business, document retention, compliance with regulatory guidance and exercise or defence of legal claims.

Where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected we will not process your personal data unless there is another legal ground for us to do so (either that we have obtained your consent to the processing or it is necessary for us to perform our contract with you or to comply with our legal obligations).

6. Who we share your personal data with

We may provide your personal data to our suppliers and service providers who provide certain business services for us and act as “processors” (e.g. TIS-Web service) of your personal data on our behalf. In addition, we may disclose your personal data if we are under a duty to disclose or share your personal data to comply with any legal obligation, or in order to protect the rights, property, or safety, of our business, our customers or others. This includes, in specific cases, exchanging information with other organisations for the purposes of fraud protection.

7. How long we keep your personal data for

We retain your personal data for no longer than is necessary for the purposes for which it was provided. What this means in practice will vary between different types of data. When determining the relevant retention periods, we consider factors including:

- legal obligation under applicable law to retain data for a certain amount of time;
- statute of limitations under applicable law;
- potential or actual disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your personal data from our systems when it is no longer needed.

8. Your rights

You have the following rights regarding your personal data:

| Rights | What does this mean? |
|--------------------------------|--|
| 1. <u>RIGHT TO BE INFORMED</u> | You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. Therefore, we are providing you with the information in this Privacy Policy. |
| 2. <u>RIGHT OF ACCESS</u> | You have the right to obtain access to your personal data (if we are processing it) and certain other information (similar to that provided in this Privacy Policy). This is so you are aware and can check that we are using your personal data in accordance with data protection law. |

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| 3. <u>RIGHT TO RECTIFICATION</u> | You are entitled to have your personal data corrected if it is inaccurate or incomplete. |
| 4. <u>RIGHT TO ERASURE</u> | This is also known as ‘the right to be forgotten’ and, in simple terms, enable you to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions. |
| 5. <u>RIGHT TO RESTRICT PROCESSING</u> | You have the right to ‘block’ or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further. |
| 6. <u>RIGHT OF DATA PORTABILITY</u> | You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party. |
| 7. <u>RIGHT TO OBJECT TO PROCESSING</u> | You have the right to object to us processing your personal data for our legitimate business interests or for direct marketing purposes (including in each case any related profiling). |
| 8. <u>RIGHT TO WITHDRAW CONSENT TO PROCESSING</u> | If you have given your consent to us to process your personal data for a particular purpose (for example, direct marketing), you have the right to withdraw your consent at any time (although if you do so, it does not mean that any processing of your personal data up to that point is unlawful). |
| 9. <u>RIGHT TO MAKE A COMPLAINT TO THE DATA PROTECTION AUTHORITIES</u> | You have the right to make a complaint to the Information Commissioner’s Office (ICO) if you are unhappy with how we have handled your personal data or believe our processing of your personal data does not comply with data protection law. |

9. How to contact us

If you would like to exercise your data protection rights or if you are unhappy with how we have handled your personal data, please feel free to contact us by using the details set out on our website.

If you are not satisfied with our response to any enquiries or complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner’s Office (ICO) by:

- writing to: Information Commissioner’s Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF;
- calling: 0303 123 1113; or
- submitting a message through the ICO’s website at: ico.org.uk

10. Links to other websites

Our website may contain hyperlinks to websites owned and operated by third parties. This Privacy Policy does not apply to those other websites. We encourage you to read the privacy statements on the other websites you visit, as they will govern the use of any personal data you provide when visiting those websites. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

11. Changes to this Privacy Policy

This Privacy Policy was last updated on 24 May 2018.