

## Privacy Policy

**Effective from:** 24<sup>th</sup> May 2018

**Reviewed & updated:** October 2020

### BACKGROUND

Westbase Group Ltd and its affiliates understands that your privacy is important to you and that you care about how your personal data is used

#### 1. Information About Us

Westbase Group Ltd registered in England and Wales under company number 10349073

Registered and Main Trading address: Westbase House, 2 Lodge Way, Severn Bridge Industrial Estate, Caldicot, Monmouthshire, NP26 5PS.

Data Protection Officer: Josephine Bean.

Email address: [gdpr@westbase.io](mailto:gdpr@westbase.io)

#### 2. What Does This Notice Cover?

This Privacy Information applies only to your use of our Sites. Our Sites may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

#### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

#### 4. What are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.

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- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

## 5. What Data Do You Collect and How?

Depending on your use of Our Sites, we may collect and hold some or all of the personal data set out below:

- Name
- Date of birth
- Gender
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession
- Payment information
- Information about your preferences and interests.

Your personal data is obtained from the following third parties:

- Any of our suppliers who require us to contact you with business related information after you have provided your information to them.

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. This may be

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because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Providing and managing your account.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes which may include contacting you by email or telephone with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We use the following automated system for carrying out certain kinds of decision-making. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 12.

- The following automated decision-making method may be used:
  - Experian Credit Referencing.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Business contract related information such as invoicing will be kept for the statutory period of 6 years;
- Business contact information to enable necessary business interaction and activities will be kept for no longer than is necessary after the business relationship has ended.

## 8. How and Where do You Store or Transfer My Personal Data?

We will store or transfer some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

We may store or transfer some or all of your personal data in countries that are not part of the EEA. These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

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We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These countries require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#).

## 9. Do you Share My Personal Data?

We may sometimes contract with the following third parties to supply certain products and services:

- Worldpay Credit Card Payment Services
- Courier Services such as UPS and DPD

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EE, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

In some limited circumstances we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10. Can I Withhold Information?

You may access certain areas of Our Sites without providing any personal data at all. However, to use all features and functions available on Our Sites you may be required to submit or allow for the collection of certain data.

## 11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Josephine Bean):

Email address: [gdpr@westbase.io](mailto:gdpr@westbase.io)

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## 13. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Sites following the alterations. We recommend that you check this page regularly to keep up to date.

This Policy has been approved and authorised by:

**Name:** Josie Bean  
**Position:** Director  
**Date:** 30 October 2020  
**Due for Review by:** November 2021

**Signature:**

