

**Joint Data Privacy Managers** : Sarah Griffiths [accounts@webbswood.co.uk](mailto:accounts@webbswood.co.uk) and Trudi Twitchen [trudi@webbswood.co.uk](mailto:trudi@webbswood.co.uk). Telephone 01793 783879

## 1. Important information and who we are

**Webbswood** is the Data Controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice.) We have appointed a Data Privacy Manager (details above) Please contact them with any questions about this privacy notice, and any requests to exercise your legal rights.

**Your duty to inform us of changes** It is important that the personal data we hold about you is accurate and current. Please tell us of any changes. If this notice is updated the updated version will be posted on our website.

**Third-party links** Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender passport and National Insurance numbers and CCTV images
- **Contact Data** includes billing address, delivery address, email address and telephone numbers
- **Financial Data** includes bank account building society account and payment card details
- **Transaction Data** includes details about payments to and from you and other details of goods you have purchased from us
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- **Profile Data** includes feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of our contract with you and you fail to provide that data when requested, we may not be able to perform the work you require. In this case, we may have to cancel any contract you have with us but we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct** You may give us your Identity I Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
  - Ask us to provide goods;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
  - CCTV
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below

### 4. How we use your personal data

The table below shows all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

We do NOT use your data for automated decision making.

#### Marketing

We will NEVER sell your personal data with any third party for marketing purposes.

**Opting out** . You can ask us to stop sending you our marketing messages at any time by contacting our Data Privacy Manager at any time

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a customer	(a) Identity (b) Contact	Performance of a contract with you to supply goods
To supply goods to you and be paid for them	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to

including: (a) Manage payments (b) Collect and recover money owed to us	(c) Financial (d) Transaction (e) Marketing and Communications	recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our services, to develop them and grow our business)
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods and offers that may be of interest to you (Marketing)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we do we will tell you and explain the legal basis which allows us to do so.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Our accounts team
- Our accountants and any auditors
- Our external service suppliers providers such as IT ,lawyers and credit control
- Any professional body or regulatory to whom we are accountable. For example HMRC, Fraud prevention agencies, the Police ,the Information Commissioners Office
- Our Bankers
- Our Indemnity Insurers.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. **International transfers** We do not transfer your personal data outside the European Economic Area (EEA).

7. **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. **Data retention .How long will you keep my personal data for?**

We will keep your data for seven years. In some circumstances you can ask us to delete your data: see later for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. **Your legal rights**

Please contact our Data Privacy Manager rights if you want to exercise any of the following rights

**Request access** to your personal data (commonly known as a "data subject access request").

**Request correction** of the personal data that we hold about you.

**Request erasure** of your personal data. Note, we may not always be able to comply with your request of erasure for specific legal reasons. We will tell you if that is the case.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) if you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. You can ask us to suspend processing of your personal data (a) if you want us to check the data's accuracy; (b) where our use of the data is no longer lawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

**No fee usually required**

There is no charge to exercise any of the rights. If your request is unfounded, repetitive or excessive we may charge or refuse to comply with your request.

**What we may need from you**

We may need specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. We will tell you if that applies.

**Information Commissioner's Office (ICO)**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.