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## Privacy Policy

### Introduction

#### Welcome to Warnes Commercials Ltd (WCL) privacy notice.

This privacy notice applies to information held about you and the individuals connected to your business by us as data controllers, as described below. It explains what information we collect about you and individuals who are connected to your business, how we'll use that information, who we'll share it with, the circumstances when we'll share it, and what steps we'll take to make sure it stays private and secure.

Wherever we say "you" or "your" this means you and any individuals connected to your business. An individual connected to your business could be any director, officer or employee of a company, partners or members of a partnership, any substantial owner, controlling person, or beneficial owner, your attorney or representative, agent or nominee, or any other persons or entities whom you have a relationship with that's relevant to your relationship with us.

#### 1. Important information and who we are

##### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how WCL collects and processes your personal data, including any data you may provide when you engage our services.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

##### CONTROLLER

Warnes Commercials Ltd is the controller and responsible for your personal data (collectively referred to as "WCL", "we", "us" or "our" in this privacy notice).

##### CONTACT DETAILS

Our full details are:

Full name of legal entity: Warnes Commercials Ltd

Email address: [admin@warnescommercials.com](mailto:admin@warnescommercials.com)

Postal address: Great Dunham Hall, Great Dunham, King's Lynn, Norfolk, PE32 2LQ

Telephone number: 01328 701317

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.

##### CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### 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 name, username or similar identifier.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of services you have purchased from us.
- CCTV data includes images collected of you either at our premises or in the vicinity of our vehicles
- that you've provided to us



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We do not knowingly collect the following Special Categories of Personal Data about you: details about your 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.

It is possible that we collect details about your race and ethnicity when processing CCTV images. In this instance processing is necessary for reasons of substantial public interest in order to:

- prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
- for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
- to support law enforcement bodies in the prevention, detection and prosecution of crime; and
- to assist in the defence of any civil litigation.

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

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

- Direct interactions. You may give us your Identity, Contact and Financial Data and other information about you and individuals connected to your business by filling in forms or by corresponding with us by post, phone, email or otherwise.
- CCTV operations. We may record and store information about you from CCTV at any of our premises or attached to our vehicles.
- 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, 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:
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from brokers or intermediaries.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

#### **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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..

#### **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 and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

<b>PURPOSE/ACTIVITY</b>	<b>TYPE OF DATA</b>	<b>LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order and carry out your instructions including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Collect and deliver consignments	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) CCTV	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to 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 (c) investigating and resolving complaints (d) recovering money which you owe	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) CCTV	(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 customers use our products/services)
To administer and protect our business including: (a) data analysis, testing, system maintenance, support, reporting and hosting of data) (b) undertaking risk management (c) protecting our legal rights and complying with our legal obligations	(a) Identity (b) Contact (c) Technical (d) CCTV	(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

## 5. Disclosures of your personal data

We may have to share your personal data for the purposes set out in the table above with external third parties such as:

- Subcontractors who we might engage to carry out some or all of the services we provide to you.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- 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.

### INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

## 6. 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.

## 7. Data retention

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

Some data we are required to maintain for a minimum period of time, examples include:

- CCTV video recordings on our vehicles for up to 3 months, or longer where it is necessary for the establishment, exercise or defence of legal claims;
- Site attendance logs, details of orders, PODs, invoices to customers (comprising names, addresses, telephone numbers, email addresses, payment details) for a minimum of 6 years where it is necessary for the establishment, exercise or defence of legal claims.

## 8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as 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. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful 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. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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. We will advise you if this is the case at the time you withdraw your consent.

Should you wish to enforce any of your rights listed above, please email [admin@warnescommercials.com](mailto:admin@warnescommercials.com) and let us know.