

**CUSTOM WYTELYNE POWDER COATING LIMITED**

**PRIVACY NOTICE**

**About us**

Custom Wytelyne Powder Coating Limited ("We") takes care to protect and respect your privacy. This policy (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This policy applies to you as a potential or actual customer of ours. Whilst many of our customers will be limited companies, some may be sole traders, partnerships or such small businesses that the data relating to the company shall also relate to the owner. This privacy notice seeks to set out how we protect your privacy as an individual. However for our limited company customers we treat their information with the same level of care and respect.

For the purpose of the Data Protection Requirements\* the data controller is Custom Wytelyne Powder Coating Limited, company number 02994947, of 88 Hopewell Drive, Chatham, Kent, ME5 7NL. Our Compliance Officer is Martin Gould.

*\* Data Protection Requirements means the Data Protection Act 1998 (or The Data Protection Act 2018), the EU Data Protection Directive 95/46/EC, the Regulation of Investigatory Powers Act 2000, the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (SI 2000/2699), the Electronic Communications Data Protection Directive 2002/58/EC, the Privacy and Electronic Communications (EC Directive) Regulations 2003, the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011, the General Data Protection Regulation (from 25 May 2018) and all other applicable laws and regulations relating to processing of personal data and privacy in any applicable jurisdiction as amended and replaced, including where applicable the guidance and codes of practice issued by the UK Information Commissioner or such other relevant data protection authority;*



H.M.Gould

L.Callow FMAAT  
88 Hopewell Drive, Chatham, Kent, ME5 7NL  
2994947

CWPCL PN 24.05.2018 (v.1.2)

Custom Wytelyne  
Powder Coating Ltd  
88 Hopewell Drive  
Chatham, Kent  
ME5 7NL  
UK

Tel: 01634 819520

Fax: 01634 819510

Email: [sales@custom-powder.co.uk](mailto:sales@custom-powder.co.uk)

Website: [www.custom-powder.co.uk](http://www.custom-powder.co.uk)

## **How to Contact us**

If you want to request further information about our privacy policy or exercise any of your rights you can:

email us:       Martin@custom-powder.co.uk

write to us:     88 Hopewell Drive, Chatham, Kent, ME5 7NL

You can also contact the Information Commissioner's Office via [www.ico.co.uk](http://www.ico.co.uk) or at Wycliffe House Water Lane, Wilmslow, Cheshire SK9 5AF or 0303 123 1113 for information, advice or to make a complaint.

Custom Wytelyne Powder Coating Limited strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

We are also happy to provide any additional information or explanations needed. Any requests should be sent to us using one of the methods above.

## **Information we collect from you and what we do with it**

We may collect and process a variety of data about you from information you give us. You may give us information about you by filling in forms on our website or by corresponding with us by telephone, e-mail or otherwise. This includes information you provide when you apply for a quotation or when you receive goods or services from Custom Wytelyne Powder Coating Limited.

The information you give us will vary but may include:

- your name, supply address, billing address, e-mail address and phone numbers;
- financial information.

We use your information for the specific purpose(s) for which it has been provided to or collected by us and also to administer, support, improve and develop our business generally and to enforce our legal rights.

More detailed information on what we collect in different circumstances and how it will be used is set out below.

## **Lawful basis for processing**

We will only process your information if we have a lawful basis to do so. There are 6 lawful basis of processing as set out in the Data Protection Requirements and the ones that most apply to Custom Wytelyne Powder Coating Limited are set out below.

## **Contract**

Where you are being provided with our services this is done by way of a contract with you and we will process your personal information to fulfil the terms and conditions of this contract.

## Consent

In some cases we may need your consent to process the information e.g. where you provide us with sensitive personal data such as health data, or in relation to marketing activities. When we use consent we will make sure we collect your consent and record it and that we will tell you how you can withdraw your consent if you change your mind.

## Legal obligation

Some of the activities we carry out are necessary to ensure compliance with our legal and regulatory obligations, e.g. filing certain documentation with HMRC.

## Legitimate interests

Where the activities are not strictly necessary for compliance with a legal obligation we may process your information in accordance with our legitimate interests e.g. carrying out market research or customer satisfaction or feedback surveys.

We always check that our legitimate interests are not overridden by your rights and that such processing is set out in this privacy notice.

## **What to expect when you contact us?**

### **Contacting us by telephone or email**

When you contact us we will take your name, address and telephone and email in order to be able to provide you with a service.

### **Making a complaint**

We may use the personal information we collect to process a complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

## **Visiting our website**

With regard to each of your visits to our website we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Information gathered through cookies and similar technologies are used to measure and analyse information on visits to our websites, to tailor the websites to make them better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

Our website may also, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Information about cookies we use**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We only use cookies that are required for the operation of our website.

No personal information is kept in the session cookie and it is destroyed when the session ends.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. More information can be found here: [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies)

### **Information we collect or obtain from others about you**

We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this website.

We also work closely with trusted partners (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, local authorities and credit reference agencies) and may receive information about you from them.

### **Information we share with others**

In many circumstances we will not disclose personal data without your consent. However, there are circumstances where we need to share some of your data in order to meet our compliance obligations or where we are permitted to under the Data Protection Requirements.

### **Customers who are in arears**

If customers fall behind with their payments and we are unable to locate them to chase their debt, we may share their data with credit reference agencies that will help us to track people's locations for the purpose of collecting debt.

#### **Circumstances where we can pass on personal data without consent**

Sometimes we are contacted by the police, fraud agencies or Immigration asking for information about individual customers. Under the Data Protection Requirements, we are permitted to share this data with them without your consent only if this is in connection with the prevention of crime. In such cases you would not be notified that this had been done.

#### **Other third parties**

If we merge with another business entity or divest a part of our business or carry out internal corporate restructuring, your information may be disclosed to Custom Wytelyne Powder Coating Limited's new business partners or owners or the new corporate entities.

#### **Trusted partners we use who may have access to your data**

We use trusted partners to help us process your data and provide services to you. All of our data processors have a binding contract with us that restricts their access to and handling of your personal data to only what is necessary in performance of their contract.

From time to time we require legal advice and may need to share your personal data with our legal advisers or our insurance company or other professional advisors in order to obtain advice or make a claim.

We also require accountancy advice from time to time and may need to share your personal data with our accountant.

Custom Wytelyne Powder Coating Limited also uses a trusted partner service to help maintain the security and performance of the website. To deliver this service the trusted partner processes the IP addresses of visitors to the website.

Custom Wytelyne Powder Coating Limited uses a trusted partner to help operate and maintain its CCTV systems at its premises. CCTV is used to help maintain the security, safety and performance of Custom Wytelyne Powder Coating Limited operations. To facilitate this service, the trusted partner may process images of visitors to Custom Wytelyne Powder Coating Limited site.

#### **Where we store your information and how we keep it safe**

All customer personal data is held in our invoicing system in the UK which has controlled access. We also operate strict physical security at all our sites and all relevant employees receive security and data protection awareness training.

Where we transfer information to third parties to enable them to process it on our behalf (see the information about Trusted Partners above), we ensure that the providers meet or exceed the relevant legal or regulatory requirements for transferring data to them and keeping it secure.

We also ensure that where information is transferred to a country or international organisation outside of the UK / EEA, we will comply with the relevant legal rules governing such transfers.

### **How long we will keep your information**

We keep customer billing and correspondence until that customer is no longer being supplied by us or as required by law.

### **Marketing**

If you have been contacted by us as a potential customer, this will be in accordance with the rules on direct marketing and in compliance with the Data Protection Requirements. Once we speak to you we will collect your consent to future marketing.

We may then use your personal information for marketing purposes but only in accordance with your preferences. We may ask you from time to time to update these preferences.

### **Your data protection rights**

You have certain rights in relation to your personal information, although those rights will not apply in all cases or to all information that we hold about you. For example, we may need to continue to hold and process information to establish, exercise or defend our legal rights. Alternatively, the rights may not be enforceable until the General Data Protection Regulation comes into force on 25 May 2018. We will tell you if this is the case when you contact us.

You have the **right to be informed** and we will try to be as transparent as possible in our interactions with you. Any time you give us personal information you have a right to be informed about why we need it and how we will use it. You can find most of the information you need right here in this Privacy Notice.

You have a right of access to any personal data we hold about you. You can contact us at any time to gain information about what data we hold, why we hold it, where we got it from and how we will use and share it. You may choose to write to us to exercise your **Subject Access right**. If you make a formal written request we will respond to acknowledge your request and check your identity, we might also ask you for information about what you are looking for to help us make sure we meet your request fully. You will receive a full response at the earliest opportunity but in any event within 30 calendar days of your request. There is no charge made for this by Custom Wytelyne Powder Coating Limited.

To make a request to Custom Wytelyne Powder Coating Limited for any personal information we may hold you need to put the request in writing addressing it to our Compliance Officer using the contact details provided above. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

You have the right to have any personal data we hold **corrected** at any time if you believe it to be inaccurate e.g. the spelling of your name or your contact information.

You also have the right to ask for our processing of your personal data to be **restricted** for example if you are contesting the accuracy of data we are using to bill you. We will restrict our processing while we verify the accuracy of the data that we hold.

You can also ask for certain information about you to be **deleted**. We will not be able to delete any data relating to outstanding debts until the debt has been repaid.

You have the right to **data portability** where our lawful basis for processing is consent and where processing is automated, although we don't currently carry out any such processing. We will however

ensure that your data is ported to your new retailer or from your old one in relation to the switching rules.

You have the right to ask us not to process your personal data for **marketing or profiling purposes**. We will ask for your consent (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting our Compliance Officer using the contact details provided above.

### **Changes to this Privacy Notice**

This privacy notice will be kept up to date as our business and internal practices and/or the Data Protection Requirements change and so may be subject to change at any time to reflect any changing activities. The most up to date version will always be available on our website.

We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained (if we intend to do so, we will notify you in advance wherever possible) or otherwise than is permitted by the Data Protection Requirements.

We keep our Privacy Notice under regular review. This Privacy Notice was last updated on 24 May 2018.

*WILLIAMSON TOWERS WATSON*