

## **IDENTITY & CONTACT DETAILS OF THE CONTROLLER & THE CHIEF PRIVACY OFFICER**

Spaldings Ltd ('we' or 'us' or 'our'), are committed to protecting and respecting your privacy whilst remaining compliant with The General Data Protection Regulation (EU GDPR) and the Data Protection Act (DPA). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. For us to drive compliance, we have an Information Governance Framework imbedded within the organisation, which is compliant with The General Data Protection Regulation.

Spaldings Ltd, are the Data Controller and have an appointed Chief Privacy Officer whom can be contacted via email: [privacy@spaldings.co.uk](mailto:privacy@spaldings.co.uk)

You can also contact Spaldings Ltd, via post at: 25-35 Sadler Road, Lincoln, Lincolnshire, LN6 3XJ

## **PURPOSE OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING**

We collect and create personal data for several different purposes:

1. Recruitment and employment;
2. Business development;
3. Provision of services to our customers; and
4. Procurement of services

The legal basis for processing personal data for the purpose of recruitment and employment is the pursuit of our legitimate interests of developing our business (recruitment and selection) and subsequently in order to fulfil our legal obligations as an employer and our legitimate interest of striving to provide a safe and rewarding work place. We will retain personal information we collect in the recruitment and selection process for up to two years following an application for employment which we receive either directly from you or via recruitment agencies. Further information about privacy and data retention is provided in our staff handbook for employees.

The legal basis for processing personal data for the purpose of business development is the pursuit of our legitimate interest in developing our business and undertaking sales and marketing activities. We acquire personal data from a number of sources including directly from data subjects, from referrals, from social media such as Linked In, and from our own research activities such as reviewing websites. We will retain personal information we collect through our sales processes for as long as we believe our products and services may be of interest to prospects, customers and former customers.

### **Provision of services to our customers**

The legal basis for processing personal data for the purpose of providing services to our customers is either to fulfil our contractual obligations to customers or the pursuit of related legitimate interests including maintaining accurate records relating to accounting and finance, monitoring the quality of our services. We will retain personal information we collect through our service delivery processes for as long as such information is relevant to our service delivery model or as defined in our service delivery contract.

## Procurement of services

The legal basis for processing personal data for the purpose of procurement is the pursuit of our legitimate interest in maintaining efficient and effective procurement processes. Personal data we collect from suppliers and prospective suppliers is usually supplied directly by data subject or their employer. We will retain personal information we collect through our procurement processes for as long as we need to comply with accounting and taxation rules, policies and conventions.

## Consent

We are required to obtain consent from individuals in order to send them unsolicited electronic marketing messages. We retain evidence of the details of consent which has been provided by our customers to process their information in this manner.

## LEGITIMATE INTERESTS OF SPALDINGS LTD, OR THIRD PARTY

Spaldings Ltd, may use your information for other specific legitimate purposes such as:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have either explicitly consented to or we believe you have a legitimate interest in.
- To carry out our obligations arising from any contracts entered between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

We do not sell, rent or lease customer lists to third parties. However, we may share personal information with companies in our Group including Information where we feel that there is a genuine possibility of your interest in their services. The lawful basis for this data sharing is the legitimate interest of the third party in developing and growing their business.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in paper forms, forms on our sites ([www.spaldings.co.uk](http://www.spaldings.co.uk) or [www.centralspares.co.uk](http://www.centralspares.co.uk)) or by corresponding with us by phone, email or otherwise. The information you give us may include:
  - **Name and Company Name**
  - **Email address**
  - **Telephone numbers**

- **Addresses**
  - **Date of birth**
  - **Bank account details**
  - **Payment Details**
- If you contact us, we may keep a record of that correspondence.
  - We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
  - Details of your visits to our web site and the resources that you access.

## RECIPIENTS OF THE PERSONAL DATA

Spaldings Ltd, are required to transfer the personal information provided by its customers to third parties in order to fulfil contractual obligations. The following are categories of recipients that customer information could be transferred to:

- Customer relationship management (CRM)
- Data Centres
- External IT Providers
- Payment Providers
- Accountancy Services
- Finance Providers
- Credit Checking Agencies
- Corporate Partners that have referred you to us
- Suppliers for the provision of drop shipments
- Couriers

All information you provide to us is stored on our secure servers. However, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We may disclose your personal information to any member of our group (Marubeni Agri-Machinery Holdings Limited), which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will not disclose your information to any of the relevant third parties listed above for marketing purposes.

Our Chief Privacy Officer can provide you with contact details of our third parties upon request if required. You can do this by emailing our Chief Privacy Officer at [privacy@spaldings.co.uk](mailto:privacy@spaldings.co.uk).

## Payments

As a company we provide paid for products and/or services to our customers. When collecting payment for these products and/or services we use a variety of third-party services for payment processing (e.g. payment processors) dependent upon how you engaged with us.

We will not store or collect your payment card details. That information is provided directly to our third party payment processors whose use of your personal information is governed by their

Privacy Notice / Policy. These payment processors adhere to standards as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard and American Express. PCI-DSS requirements help to ensure the secure handling of payment information.

The payment processors we work with are:

- Stripe: Their Privacy Policy can be viewed at <https://stripe.com/gb/privacy>
- Sage Pay: Their policies can be viewed at <https://www.sagepay.co.uk/policies>
- Worldpay: Their Privacy Policy can be viewed at <https://www.worldpay.com/uk/privacy-policy>

## DETAILS OF TRANSFERS TO THIRD COUNTRIES & SAFEGUARDS

Spaldings Limited store personal data on information systems that may transfer to third countries as follows:

- Mailchimp
- Stripe
- Worldpay

e.g. USA, controls are in place to ensure that the level of protection is not undermined and that security controls are at a level to commensurate with the type of information being transferred. Further information is available on the privacy shield web site:

<https://www.privacyshield.gov/welcome>

Aside from this, we ensure that all other personally identifiable information held on our customers and employees remains within the EEA.

## RETENTION PERIOD

We retain all customer information for 7 years from the end of the financial year after they last interacted with us unless:

- a) you ask us to remove it
- b) we believe that you are no longer interested in our business
- c) we no longer need it for the purposes it was collected.

Where there has been a period of 3 years and there has been no interaction between the organisation and the customer, their account information is closed.

## RIGHTS OF DATA SUBJECTS

As a Data Subject (individual) for whom we process information on behalf of, you have the right to request access to, and the rectification or erasure of personal data that we hold about you as well as a right to object to and to a restriction of our processing of your personal data at any given time. You can do this through the contact details provided on page 1 of this policy. You can exercise the right at any time by contacting us at [privacy@spaldings.co.uk](mailto:privacy@spaldings.co.uk).

You also have a right to lodge a complaint with the Supervisory Authority (Information Commissioners Office (ICO) in the UK - at <https://ico.org.uk>), should you feel that we have not handled your information in line with legislative and regulatory requirements.

You have the right to make a Data Subject Access Request to Spaldings Limited, Chief Privacy Officer if you wish to determine what information we hold on you. We welcome these requests and aim to respond within 72 working hours of receipt.

## **IP ADDRESSES**

We may collect information about your computer, including where available your IP address and ISP, geographic location (if you allow when prompted by your browser), operating system and browser type, screen size, for system administration when you access our website. We use this information for statistical data about our users' browsing actions and patterns when they access our website.

## **COOKIES**

To enable our systems to recognise your device and to provide features to you, we use cookies. For more information about cookies and how we use them, please read our [Cookie Policy](#).

## **CHANGING YOUR PRIVACY SETTINGS OR UNSUBSCRIBING FROM OUR PRIVACY POLICY**

In the event that you wish to you alter your Privacy settings or opt-out, you are able to do this by emailing our Chief Privacy Officer at [privacy@spaldings.co.uk](mailto:privacy@spaldings.co.uk). Our Chief Privacy Officer shall provide you with contact details of our third parties upon request if required.

## **MARKETING COMMUNICATIONS**

We may send out email communication such as our newsletter to keep you up to date with all our latest Data Protection News and offers. If you wish to unsubscribe from these emails you can do so at any time by simply clicking the link in the footer and you will be removed from all promotional emails.

Please note that even if you decide not to subscribe to, or to unsubscribe, from promotional email messages, we may still need to contact you with important transactional information related to your account and your purchases. For example, even if you have unsubscribed from our promotional email messages, we will still send you confirmations when you confirm products and/or services from our sites.

## **CHANGES TO OUR PRIVACY POLICY**

We may change this Privacy Policy from time to time.

If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will make that clear on our websites or by email, so that you are able to review the changes.

## **CONTACT**

## Privacy Policy



Questions, comments and requests regarding this privacy policy are welcomed and should either be emailed to [privacy@spaldings.co.uk](mailto:privacy@spaldings.co.uk) or addressed to Chief Privacy Officer, Spaldings Limited, 25-35 Sadler Road, Lincoln, LN6 3XJ.