

Data privacy notice for clients and suppliers

Introduction

At Weber Industries ("We") are committed to protecting and respecting your privacy. This policy (together with any other documents referred to on 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. The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions and categories

- 1.1. 'Data controller' – A controller determines the purposes and means of processing personal data.
- 1.2. 'Data processor' – A processor is responsible for processing personal data on behalf of a controller.
- 1.3. 'Data subject' – Natural person.
- 1.4. 'Personal data' – The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example: name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.
- 1.5. 'Special categories personal data' – The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.
- 1.6. 'Processing' – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring,



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storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

1.7. 'Third party' – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

2.1. Weber Industries is the data controller. This means we decide how your personal data is processed and for what purposes. We can be contacted by post at Studio 11G, 90 Haymerle Road, London, SE15 6SB; by telephone on 020 77324651 or by email via info@weberindustries.com.

2.2. For all data matters contact Anna Bunting-Branch (Office Manager) by email via anna@weberindustries.com.

3. The purposes of processing your personal data

We use your personal data for the following purposes:

- To fulfil our legal obligation to deliver client projects in a timely and efficient manner in accordance with our Terms and Conditions;
- For credit control purposes (i.e. invoicing, debt recovery etc.);
- For marketing purposes (i.e. mailing list, newsletter, invitations to our events etc.).

4. The categories of personal data concerned

4.1. With reference to the categories of personal data described in the definitions section, we process data categorised as Personal Data, including name, address (business or individual), telephone number (business or individual), email (business or individual), bank details (business or individual).

4.2. We have obtained your personal data from direct correspondence with you or from public websites.



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5. What is our legal basis for processing your personal data?

5.1. Our lawful basis (as detailed in article 6 of GDPR) for processing your general personal data is:

- a) In the case of our clients and suppliers, it is necessary for the performance of a contract with the data subject (as detailed in correspondence and in accordance with our Terms and Conditions).
- b) In the case of our mailing list, we have the consent of the data subject.

5.2. More information on lawful processing can be found on the ICO website.

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with relevant staff and third parties for legitimate purposes (for example, the delivery of client projects, debt recovery or marketing emails).

7. How long do we keep your personal data?

7.1. We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes:

- in case of any legal claims/complaints
- to keep you updated about our business.

7.2. We use the following criteria to determine how long to retain your personal data:

- Six years in accordance with HMRC regulations on company accounts, where applicable;
- Or, where applicable, until you request to be unsubscribed from our mailing list.

8. Providing us with your personal data

We require your personal data as a requirement necessary to enter into a contract and to keep you updated about our business.



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9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

If personal data is to be transferred outside the EEA, for project reasons (i.e. To share with a specialist supplier) you will be notified in advance.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.



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13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

14.1. To exercise all relevant rights, queries or complaints please in the first instance contact Anna Bunting-Branch (Office Manager) by email via anna@weberindustries.com.

14.2. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

Signed:



Gavin Weber
Director

Date: 1 December 2019
Review date: 1 December 2020



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