

# PRIVACY POLICY

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

## 1. WHO WE ARE

Aperture Trading Ltd (registered with company number 11830542) collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

## 2. THE PERSONAL INFORMATION WE COLLECT AND USE

### 2.1 Information collected by us

In the course of entering into a contract with business customers for the sale of Aperture Trading Ltd products we collect the following personal information from you, as a representative of our business customer, when you provide it to us:

- The names and contact details of individual representatives (for example, the details of persons placing an order on behalf of their organisation)
- Delivery addresses, if delivery is to be made to an individual's address rather than business premises.

## 3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information to administer the contract and general relationship between us and our business customers, for example in relation to:

- Processing an order that has been made by a business customer
- Carrying out our rights and obligations under a contract with a business customer
- Notifying you on behalf of our business customer of progress or of any issues in fulfilling an order
- Arranging delivery, invoicing and payment
- After-sales support
- Marketing about our products

## 4. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share details of our business customers with third parties who we engage in relation to cash collection, pursuit of overdue invoices and debt collection, as well as with data processors to mail out relevant marketing and information. Those third parties are providing those functions in relation to our business customers, however as part of that service we may where required share with them your name, job description and work contact details so that they may have an individual point of contact to communicate with in relation to cash collection, pursuit of invoices, debt collection, marketing and communication activity.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party, and will at all times ensure the integrity of your data by sending all data as encrypted files.

## **5. WHETHER INFORMATION HAS TO BE PROVIDED BY YOU, AND IF SO WHY**

The provision of your name and contact details (such as telephone, email and a business postal address) is required from you to enable us to administer the contract between us and the business for whom you act. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

## **6. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT**

We will hold your personal information only for as long as necessary to administer any contract between us, including any post-sales support and warranty period.

## **7. REASONS WE CAN COLLECT AND USE YOUR PERSONAL INFORMATION**

We need to collect and use your personal information for our legitimate commercial interests in entering into and administering the contract with the business which you represent. We only use your personal information to the extent that it is necessary to communicate with our business customers.

## **8. YOUR RIGHTS**

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them

## **9. KEEPING YOUR PERSONAL INFORMATION SECURE**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

## **10. HOW TO COMPLAIN**

We hope that we can resolve any query or concern you raise about our use of your information. You also have the right to complain to the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

## **11. CHANGES TO THIS PRIVACY NOTICE**

This privacy notice was published on 05/03/2019.

We may change this privacy notice from time to time, when we do we will inform you via our website.

## **12. HOW TO CONTACT US**

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us please write to Aperture Trading Ltd, Common Road, Huthwaite, NOTTINGHAMSHIRE. NG17 6AD or call 01623 443 200.