Privacy Notice – Customers

General Data Protection Regulations



Introduction

Bates Office Services Ltd (ICO registration Z7503426) take the security of your personal information very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact: privacy@batesoffice.co.uk

If you have entered into a contract with Bates Office, the controller of your data will be Bates Office.

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

1. What information do we collect?

We collect and process personal data about you when you interact with us and our products and when you purchase goods and services from us. The personal data we process includes:

- your name;
- your username and password;
- your address, email and/or phone number;
- your job title;
- your payment and delivery details, including billing and delivery addresses where you make purchases from us;
- recordings of calls you make to our team;
- signed delivery notes; and/or
- any other information you provide.

2. How do we use this information and what is the legal basis for this use?

We process the personal data listed in paragraph 1 above for the following purposes:

- as required to establish and fulfil a contract with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it;
- to comply with applicable law and regulation;
- in accordance with our legitimate interests in protecting Bates Office legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- with your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services;
- we may use information you provide to personalise (i) our communications to you; (ii) our website;
 and (iii) products or services for you, in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;

v1 Page 1 of 3

Privacy Notice – Customers

General Data Protection Regulations



- if you provide a credit or debit card, we may also use third parties (such as POS payment providers)
 to check the validity of the sort code, account number and card number you submit in order to
 prevent fraud, in accordance with our legitimate interests and those of third parties;
- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- in circumstances where you contact us by telephone, calls may be recorded for quality, training and security purposes, in accordance with our legitimate interests; and
- we may use your information to invite you to take part in market research or surveys.

We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

3. With whom and where will we share your personal data?

We may share your personal data with our suppliers to process it for the purposes of delivery of products or services where elements of these are provided by our suppliers other than those with which you have directly contracted.

We may also share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial advisors; and/or
- our suppliers, business partners and sub-contractors;

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of Bates Office for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance and credit/identity checking.

In the event that our business or any part of it being sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

4. How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a customer, we will keep your information for the length of any contractual relationship you have with us, in line with legal retention obligations (e.g. financial), and securely erase/destroy your data once it is no longer necessary to hold this.

Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content.

v1 Page 2 of 3

Privacy Notice – Customers

General Data Protection Regulations



In the case of any contact you may have with our customer services team, we will retain those details for as long as is necessary to resolve your query.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require Bates Office to hold certain information for specific periods other than those listed above.

5. Where is my data stored?

Your data will be held in the UK. In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. We will ensure that adequate safeguards are in place before this happens.

6. What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by asking when we collect your data, clicking the unsubscribe button on any communication we have sent to you, or by contacting us at any time.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

7. Where can I find more information about Bates Office handling of my data?

Should you have any queries regarding this Privacy Notice, about Bates Office processing of your personal data or wish to exercise your rights you can contact Bates Office Privacy Team using this email address: privacy@batesoffice.co.uk. If you are not happy with our response, you can contact the Information Commissioner's Office: https://ico.org.uk/

v1 Page 3 of 3