

# Privacy Notice

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## 1 Who We Are

- 1.1 Woodley Equipment Company Ltd ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.
- 1.2 Woodley Equipment Company Ltd's registered office is at Old Station Park Buildings, St John Street, Horwich, Bolton, BL6 7NY, United Kingdom and we are a company registered in England and Wales under company number 4669537. We are registered on the Information Commissioner's Office Register; registration number ZA097155, and act as the data controller when processing your data.
- 1.3 Our designated Data Privacy Team can be contacted at [dataprivacy@woodleyequipment.com](mailto:dataprivacy@woodleyequipment.com).

## 2 Information That We Collect

- 2.1 Woodley Equipment Company Ltd collects and processes a range of information about you, provided by you when you use our services. We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.
- 2.2 The personal data that we collect from you includes, but is not limited to:
  - 2.2.1 Name
  - 2.2.2 Business Address, Email, Telephone Number (s)
  - 2.2.3 CCTV images if you visit a Woodley Equipment Company Ltd premises
- 2.3 We collect information in the below ways:
  - 2.3.1 Verbally
  - 2.3.2 Email
  - 2.3.3 Online/ website form
  - 2.3.4 CCTV
  - 2.3.5 Analytical cookies on our website
  - 2.3.6 From time to time, we may work with third parties (for example, marketing agents) to identify individuals who may be interested in our products and services or in some cases our clients' or partners' products and services. These third parties may give us access to your contact data, where they are lawfully permitted to do so.

## 3 How We Use Your Data (Legal Basis For Processing)

- 3.1 Woodley Equipment Company Ltd takes your privacy very seriously and we will never disclose, share, or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and/or marketing, you are free to withdraw this consent at any time.
- 3.2 The purposes and reasons for processing your personal data are detailed below:

- 3.2.1 We collect your personal data in the performance of a contract or to provide a service, and to ensure that orders are completed and can be sent out to your preferred address
- 3.2.2 We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- 3.2.3 We share your basic personal data e.g. your name and business address with our logistics companies, in order to fulfil our contractual requirements with you. We therefore rely on the lawful basis of 'contract' to process and share your basic personal details with our logistic companies.
- 3.2.4 We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests. Every time we send you marketing information you will be provided with a link to opt-out.
- 3.2.5 We may occasionally contact you as part of a customer or supplier satisfaction survey; we carry out these surveys to improve our Services. However, if we contact you about this, you do not have to take part in the surveys. If you decide that you do not want to take part in these, this will not affect your ability to use our Services.
- 3.2.6 When you use our website, we collect information via Cookies. Such information is processed on the basis of legitimate interests (Strictly Necessary Cookies) and consent (Functional, Tracking, Targeting and Advertising Cookies) which can be provided via our pop-up banner, updating your preferences link or your browser settings. Please see section 11 for further information.
- 3.2.7 We utilise CCTV to record images of individuals and their vehicles. This data is collected for the personal safety of employees and clients; protection of vehicles against damage or vandalism and to support law enforcement. CCTV images are processed on the grounds of legitimate interests.
- 3.2.8 To process personal data for legal and regulatory purposes where applicable, for example e.g. communications with relevant data privacy supervisory authorities; medical product regulatory authorities; and legal and advisory third parties.
- 3.2.9 To process complaint information where applicable.

## **4 Your Rights**

- 4.1 Individuals have the following rights regarding Personal Data processing and the data that is collected and held about them:
  - 4.1.1 the right to be informed
  - 4.1.2 the right to rectification
  - 4.1.3 the right to erasure (also known as the 'right to be forgotten')
  - 4.1.4 the right to restrict processing
  - 4.1.5 the right to data portability
  - 4.1.6 the right to object
  - 4.1.7 rights with respect to automated decision-making and profiling

- 4.2 In some cases, certain individual rights may not apply, this depends on the lawful basis relied upon for the data processing. We will handle each request on a case by case basis and we will always communicate with you if an individual right does not apply. For example, where we rely on the lawful basis of 'contract' you do not have the right to object to the data processing.
- 4.3 You have the right to access any personal information that Woodley Equipment Company Ltd processes about you and to request information about:
- 4.3.1 What personal data we hold about you
  - 4.3.2 The purposes of the processing
  - 4.3.3 The categories of personal data concerned
  - 4.3.4 The recipients to whom the personal data has/will be disclosed
  - 4.3.5 How long we intend to store your personal data for
  - 4.3.6 If we did not collect the data directly from you, information about the source
- 4.4 If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.
- 4.5 You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.
- 4.6 If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.
- 4.7 We will ensure we respond to all individual rights requests within the statutory timeframe set out in the UK/EU General Data Protection Regulation. The current statutory timeframe in the UK/EU to respond to individual rights requests is 30 days. Where requests are deemed complex, individuals will be notified as soon as possible and at the beginning of the request process. The statutory timeframe for complex requests altogether is two months. Occasionally individual rights requests can be deemed 'manifestly unfounded'. This term may apply if the individual making a request clearly has no intention to exercise their right, or if the request is malicious in intent. If Woodley Equipment Company Ltd deem a request to fall under this category we may refuse the request altogether and explain why, or charge a reasonable fee.
- 4.8 We will always respond to any individual rights requests within the legislative timeframe and acknowledge your request within 7 days.

## **5 Sharing And Disclosing Your Personal Information**

- 5.1 We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal or regulatory requirement such as to assist in the event of an emergency, statutory authorities (eg law enforcement, tax authorities or fraud prevention agencies) as may be required. Woodley Equipment Company Ltd uses third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.
- 5.2 Services Provided By Third Parties

- 5.2.1 Couriers, Fast Parcel Operators, Freight Forwarders used for logistics as appropriate in the performance of a contract or to provide a service, and to ensure that orders can be sent out to your preferred address
  - 5.2.2 IT systems, software and hosting services as appropriate for the operations of the company
  - 5.2.3 Accounting, credit reference, debt collection, signing contracts and legal services as appropriate for the operations of the company
  - 5.2.4 Email distribution service such as Mail Chimp or Survey Monkey, as appropriate for the operations of the company
  - 5.2.5 Business partners such as appointed distributors in the performance of a contract or to provide a service, and to ensure that orders are completed and can be sent out to your preferred address
- 5.3 With all key third party providers we have ensured relevant data privacy and data security due diligence has been carried out, and that there are contracts in place with the relevant data privacy and security provisions in place.
- 5.4 Woodley Equipment Company Ltd utilises CCTV as part of its business and activities. The reasons for using CCTV are noted under the 'How We Use Your Personal Data' section above. There is appropriate signage in the areas where CCTV is in operation which confirms the purposes for the CCTV being in operation and displays a contact number for any queries or for the submission of individual rights requests. Footage is retained for 30 days. Woodley Equipment Company Ltd may disclose CCTV footage to law enforcement agencies where it is required in the detection or prosecution of crime, or to other building occupants where there is a reasonable requirement. We retain a record of all CCTV footage disclosures.
- 5.5 Woodley Equipment Company Ltd may share your data with our affiliates within the Woodley group of companies and to our shareholders.

## **6 Safeguarding Measures**

- 6.1 Woodley Equipment Company Ltd takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including, but not limited to:
- 6.1.1 restricted access
  - 6.1.2 IT authentication
  - 6.1.3 firewalls
  - 6.1.4 anti-virus/malware
  - 6.1.5 MFA
  - 6.1.6 encryptions

## **7 Processing and Transfers Outside the UK**

- 7.1 Woodley Equipment Company Ltd utilise some products or services (or parts of them) that may be hosted/stored outside of the United Kingdom, which means that we may transfer any information which is submitted by you outside of the United Kingdom for the below purposes:
- 7.1.1 logistics
  - 7.1.2 website hosting

- 7.1.3 email servers
  - 7.1.4 administrative, accounting and CRM databases
  - 7.1.5 marketing database (i.e. MailChimp, Ecommerce etc)
  - 7.1.6 any other third party service providers who either provide hosting services or provide other contracted services to us
- 7.2 Therefore, when you use any of our services, the personal information you submit may be stored on servers which are hosted outside of the United Kingdom. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by Woodley Equipment Company Ltd to protect your data and comply with the relevant data protection laws.
- 7.3 Woodley Equipment Company Ltd may also transfer personal data outside of the United Kingdom to:
- 7.3.1 Woodley Equipment Company Inc, USA in the performance of a contract or to provide a service and to ensure that orders are completed
  - 7.3.2 MOL, NL in the performance of a contract or to provide a service and to ensure that orders are completed
- 7.4 Due to the global nature of our business, your Personal Data may be transferred across international borders. If you are resident in a country that requires additional provisions to be put in place when conducting international transfers of your Personal Data, we ensure that we do so only in accordance with the applicable laws (such as the EU GDPR and UK GDPR). Wherever possible, we rely on transferring Personal Data to countries that are deemed to have adequate protection for personal data by the UK government or decisions made by the European Commission.
- 7.5 Woodley Equipment Company Ltd provides some of its products or services to individuals based in the European Union (EU). As the UK is not established in the EU, we have appointed a representative who is established in Ireland. Our EU representative can be contacted regarding all issues relating to the processing of personal data by Woodley Equipment Company Ltd within the EU.
- 7.6 Individuals or supervisory authorities based in the EU where Woodley Equipment Company Ltd is processing personal data can contact: -
- 7.6.1 Woodley Equipment Company Ltd
    - c/o Beacon Company Secretaries Limited
    - Commercial House
    - Millbank Business Park
    - Lucan
    - Co. Dublin
    - Ireland
    - Email: [dataprivacy@woodleyequipment.com](mailto:dataprivacy@woodleyequipment.com)

## **8 Consequences Of Not Providing Your Data**

- 8.1 You are not obligated to provide your personal information to Woodley Equipment Company Ltd, however, as this information is required to provide you with our services/deliver your products, we will not be able to offer our services without it.

## **9 Legitimate Interests**

- 9.1 As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.
- 9.2 An example of when we may rely on the lawful basis of legitimate interest is for the purposes of processing names and business email addresses to provide relevant product news and updates to businesses (business to business marketing).

## **10 How Long We Keep Your Data**

- 10.1 Woodley Equipment Company Ltd will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for and subject to our retention policy.
- 10.2 To determine the appropriate retention period for Personal Data, we consider:
- 10.2.1 the volume, nature, and sensitivity of the Personal Data;
  - 10.2.2 the potential risk of harm from unauthorized use or disclosure;
  - 10.2.3 the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements;
  - 10.2.4 the time periods within which we have rights to enforce any terms that apply and the time periods within which you have the right to enforce any claims against us.
- 10.3 We also retain Personal Data for the purpose of satisfying any legal, regulatory, accounting, or reporting requirements and guidance. Typically, this is a period of six years after you cease to have a contract or relationship with us. In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to.
- 10.4 Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

## **11 Cookies and Similar Technologies**

- 11.1 Woodley Equipment Company Ltd uses cookies and similar technologies, such as tags and pixels (Cookies), to personalise and improve your customer experience as you use our websites. This section provides more information about Cookies, including how we use them and how you can exercise your choices about our use of Cookies.
- 11.2 Cookies are small data files that allow a website to collect and store a range of data on your desktop computer, laptop or mobile device. Cookies help us to provide certain features and functionality on our websites and we use them to improve your customer experience. For example, we use Cookies to do the following:
- 11.2.1 Improve the way our websites work; so that we can personalise your experience and allow you to use many of their features. For example, we use Cookies to remember the contents of your shopping basket when you return to our website.



11.2.2 Improve the performance of our websites; to help us understand how our websites are being used, for example, by telling us if you get an error message as you browse. These Cookies collect data that is mostly aggregated and anonymous.

11.3 Our session Cookies are provided by Oscura, FreePrivacyPolicy.com and third-party by Google Analytics.

11.4 You can use your browser settings to accept or reject new Cookies and to delete existing Cookies. You can also set your browser to notify you each time new Cookies are placed on your computer or other device. You can find more detailed information about how you can manage Cookies at the All About Cookies (<https://www.allaboutcookies.org>) and Your Online Choices (<https://www.youronlinechoices.com/uk>) websites. If you choose to disable some or all of your Cookies, you may not be able to make full use of our websites. For example, you may not be able to add items to your shopping basket or proceed to checkout.

## 12 Lodging a Complaint

12.1 Woodley Equipment Services are committed to resolving complaints about our handling of your Personal Data in a timely manner. We only process your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

### 12.1.1 Woodley Equipment Company Ltd

Old Station Park Buildings

St John Street

Horwich

Bolton

BL6 7NY

United Kingdom

Email: [dataprivacy@woodleyequipment.com](mailto:dataprivacy@woodleyequipment.com)

### 12.1.2 Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

Fax: 01625 524 510

Email: [enquiries@ico.org.uk](mailto:enquiries@ico.org.uk)

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

13.1 We reserve the right to update this Privacy Notice at any time, to reflect how we process and look after your Personal Data or to ensure that any changes to applicable laws are addressed. Updated versions of the Privacy Notice will be published on our website. We may also notify you in other ways from time to time about the processing of your Personal Data, such as email.

### **14 Contacting Us**

14.1 If you have any questions about this privacy notice, please contact our Data Privacy Team by emailing: [dataprivacy@woodleyequipment.com](mailto:dataprivacy@woodleyequipment.com)

14.2 It is important that the Personal Data we hold is kept up-to-date and is accurate. If we have collected your Personal Data, please let us know as soon as possible by contacting us at the above email address, if there are any changes to your personal data or if you become aware of any errors in the Personal Data that we hold and we will use reasonable efforts to ensure it is adjusted accordingly.