

## Privacy Policy

### 1. HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect most personal data directly from you. We may collect data in the following ways:

- (a) When we speak to you on the phone or when you correspond with us by post or email, fill out a form on our website, contact us through social media or otherwise (for example, at a trade show or exhibition)
- (b) When you interact with our website, we will collect your IP address and other data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies
- (c) We may also collect information via our IT systems e.g.:
  - (i) Through monitoring and management of our technical systems, such as our computer networks and connections, communications, and email systems

We store personal data on our computer systems and as physical documents.

### 2. DO WE USE PERSONAL DATA FROM OTHER SOURCES?

We may also collect information:

- (a) From publicly accessible sources, e.g., company registers or professional online databases such as LinkedIn.
- (b) 2. Directly from a third party, e.g.:
  - (i) credit reference agencies
  - (ii) marketing and telemarketing agencies
  - (iii) customer due diligence providers

### 3. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For

more information about the cookies we use, please see our cookie policy.

### 4. WHAT PERSONAL DATA DO WE COLLECT?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). In respect of suppliers and customers (past, current, and prospective) and their employees, the personal data we collect may include:

- (a) Name, company name, job title, email/post address, phone number, bank details
- (b) Billing information, transaction, and payment information
- (c) Information about products and services you have purchased from us
- (d) Information to enable us to undertake credit or other financial checks
- (e) Information about how you use our IT, communication, and other systems (if applicable)
- (f) Information on your equipment, including but not limited to internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website
- (g) Your preferences in receiving marketing from us and our third parties and your communication preferences

We may also collect your responses to surveys, competitions, and promotions.

We may also collect, use and share statistical or demographic data for any purpose ("aggregated data"). Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your use of our website to calculate the

percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

**5. SENSITIVE DATA**

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g:

- (a) We have your explicit consent
- (b) The processing is in the public interest or in the interest of public health
- (c) The processing is necessary to establish, exercise or defend legal claims

**6. HOW WE USE YOUR PERSONAL DATA?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) Where we need to perform the contract, we are about to enter or have entered into with you
- (b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. A legitimate interest is when we have a business or commercial

reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own

- (c) Where we need to comply with a legal obligation

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We may process your personal data for more than one lawful ground depending on the specific purpose for which we have collected your personal data. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful Basis For Processing including basis of legitimate interest
Providing products and/or services to you, including to process and deliver your order including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	To perform our contract with you or to take steps at your request before entering a contract. It may also be necessary for our legitimate interests (to recover debts due to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	To perform our contract with you and in some circumstances to comply with our legal obligations. It may also be necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).

Purpose/Activity	Lawful Basis For Processing including basis of legitimate interest
To enable you to partake in a prize draw, competition or complete a survey.	To perform our contract with you and in some circumstances, it is necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). Further, it may also be necessary for us to comply with our legal obligations.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you.	Necessary for our legitimate interests (to develop our products/services and grow our business).
Preventing and detecting crime or fraud against you or us.	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us.
Conducting checks to identify our customers and verify their identity.	To comply with our legal and regulatory obligations.
Other activities necessary to comply with professional, legal, and regulatory obligations that apply to our business.	To comply with our legal and regulatory obligations.
Gathering and providing information required by or relating to audits, enquiries, or investigations by regulatory bodies.	To comply with our legal and regulatory obligations.
Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer and supplier base, product range or other efficiency measures.	For our legitimate interests or those of third party, i.e. to be as efficient as we can in conducting our business.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). Further, it may also be necessary for us to comply with our legal obligations.

Purpose/Activity	Lawful Basis For Processing including basis of legitimate interest
Monitoring of website traffic and repeat visitor status.	For our legitimate interests or those of a third party, i.e. to promote our business to existing, prospective and former customers likely to be able to pay for our products and services.
Preventing unauthorised access and modifications to and systems.	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for you and/or us.
Updating and enhancing customer and supplier records.	To comply with our legal and regulatory obligations.
Updating and enhancing customer and supplier records.	Necessary for our legitimate interests (to develop our products/services and grow our business).
Statutory returns	To perform our contract with you or to take steps at your request before entering into a contract.
Marketing our services to Existing and former customers. Existing and former suppliers. Third parties with whom we have had no previous dealings.	To comply with our legal and regulatory obligations.
Testing of products and services.	For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products.
Credit reference checks via external credit reference agencies.	To comply with our legal and regulatory obligations.
External audits and quality checks, e.g. for ISO accreditation and the audit of our accounts.	For our legitimate interests or those of a third party, i.e. to promote our business to existing, prospective and former customers.
Exercise or defend legal claims	For our legitimate interests or those of a third party, i.e., quality management.

## 7. MARKETING

We may use your personal data to send you updates (by email, text message, telephone, post or through social media) about our products and/or services, including exclusive offers, promotions or new products and/or services.

We have a legitimate interest in using your personal data for marketing purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations outside our group for marketing purposes. You have the right to opt out of receiving marketing communications at any time by using the 'unsubscribe' link in emails and forms on our websites.

## 8. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 9. DISCLOSURES OF YOUR PERSONAL DATA

We routinely share personal data with:

- (a) Companies within our group
- (b) Third parties we use to help deliver our products and/or services to you, e.g. Payment service providers, warehouses and delivery companies
- (c) Other third parties we use to help us run our business, e.g. Marketing agencies, market research companies or website hosts
- (d) Credit reference agencies; • our insurers and brokers
- (e) Our bank
- (f) Our it helpdesk and support provider and other third-party data processors for the supply, maintenance and security of our it and telephone systems
- (g) Our professional advisors and consultants
- (h) Our distributors, agents, and business partners

We only allow our service providers and other third parties to handle your personal data if we are satisfied, they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data as instructed, not share it with other organisations, hold it securely and retain and destroy it in accordance with our instructions.

We may also need to:

- (a) Share personal data with external auditors, e.g. In relation to iso accreditation and the audit of our accounts
- (b) Disclose and exchange information with law enforcement agencies, police forces, government, and other regulatory bodies to comply with our legal and regulatory obligations
- (c) Share information with other third parties as part of a reference request
- (d) Share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised, but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations. If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below)

Links to other websites:

Please note, our websites may contain links to other websites that are not our responsibility, and we cannot be responsible for any data that is subsequently submitted to other organisations. If you click on a link on our website that takes you to another site, your data will then become subject to the privacy policy of that website.

## 10. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

If we hold personal data about you, in some circumstances you can ask us to delete your data: see the section titled "Your Legal Rights".

## 11. INTERNATIONAL TRANSFERS

It is sometimes necessary for us to share your personal data outside the UK/EEA, e.g.:

- (a) With our offices or other companies within our group located outside the UK/EEA
- (b) With your and our service providers located outside the UK/EEA;
- (c) If you are based outside the UK/EEA

Whenever we transfer your personal data out of the UK, we can only transfer your personal data to a country or international organisation outside the UK/EEA where:

- (a) the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision')
- (b) there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects
- (c) a specific exception applies under the relevant data protection laws

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 12. HOW DO WE PROTECT YOUR DATA?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

## 13. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- (a) Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- (b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where
- (d) we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (e) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (f) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - (i) If you want us to establish the data's accuracy
  - (ii) Where our use of the data is unlawful, but you do not want us to erase it
  - (iii) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims
  - (iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- (g) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (h) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. If you wish to exercise any of the rights set out above, please contact us on the details below.
- (i) No fee usually required. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- (j) What we may need from you. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- (k) Time limit to respond. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

#### 14. HOW TO MAKE A REQUEST, COMPLAINT OR IF YOU HAVE AN ENQUIRY

We try to meet the highest standards when processing personal information. For this reason, we take any requests, complaints or enquires we receive about this very seriously. This privacy notice does not provide exhaustive detail of all aspects of our processing of personal information. However, we are happy to provide any additional information or explanation needed.

If you want to make a query, request, or a complaint about the way we have processed your personal information you can contact us directly:

- (a) By emailing us at [DPO@westgroup.co.uk](mailto:DPO@westgroup.co.uk)
- (b) By telephoning us on +44 (023 ) 9226 6031
- (c) By writing to us at the following address  
The West Group Limited trading as EoxShop:  
29 Aston Road, Waterlooville, PO7 7XJ

Alternatively, you have the right to lodge a complaint with the UK Information Commissioner or any relevant European data protection supervisory authority. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113. Alternatively, you can contact the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

#### 15. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.