

# Privacy Policy

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## **1 Introduction**

- 1.1 As part of any business, Woodley Equipment Company Ltd (Woodley) collects and processes personal data relating to customers and suppliers. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. This Policy:
  - 1.1.1 sets out the types of personal data that we collect;
  - 1.1.2 explains how and why we collect and use your personal data;
  - 1.1.3 explains when and why we will share personal; and
  - 1.1.4 explains the rights and choices you have when it comes to your personal data.
- 1.2 We offer a wide range of products and services, so we want you to be clear about what this Policy covers. This Policy applies to you if you use our services (referred to in this Policy as “our Services”). Using our Services means:
  - 1.2.1 shopping with us over the phone, by email or online or otherwise using any of the websites (“our Websites”) where this Policy is posted; and
- 1.3 if you contact us or we contact you about our Services. Some other parts of our business may need to collect and use personal data to provide you with their products and services. They will follow this privacy policy.

## **2 Data Controller**

- 2.1 The data controller is:
  - 2.1.1 Woodley Equipment Company Ltd, Old Station Park Buildings, St John Street, Horwich, Bolton, BL6 7NY.
  - 2.1.2 Email: [dataprivacy@woodleyequipment.com](mailto:dataprivacy@woodleyequipment.com)

## **3 Data Protection Officer**

- 3.1 Woodley is not required to and does not have a Data Protection Officer.
- 3.2 We do not require a Data Protection Officer because we are not a public authority and our core activities do not involve large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking) or large-scale processing of special categories of data or data relating to criminal convictions and offences.
- 3.3 If you have any questions about how your personal data is processed as a customer or supplier, please contact the Business Support Lead at the address detailed in 2.1.

## **4 What information does Woodley collect?**

- 4.1 Woodley collects and processes a range of information about you when you use our Services. This may include:
  - 4.1.1 your name, address and contact details, including email address and telephone number;
  - 4.1.2 details of your bank account and/or credit card.
- 4.2 When you shop online or browse our websites, we may collect information about your online purchases; information about your online browsing behaviour on our websites; information about any devices you have used to access our Services (including the make, model and operating system, IP address, browser type and mobile device identifiers).

- 4.3 Woodley may also receive personal data about you from third parties, for example, a supplier, distributor or legal representative.

## **5 Why does Woodley process personal data?**

- 5.1 We need to process data to make our Services available to you and to contact and interact with you.
- 5.1.1 To manage and improve our websites; we use cookies to improve your customer experience. You can disable cookies but this may affect your customer experience. For more information about cookies, see **Cookies and similar technology**.
  - 5.1.2 To detect and prevent fraud; it is important to know and monitor how our Services are used to detect and prevent fraud, other crimes and the misuse of services. This helps us ensure that you can safely use our Services.
  - 5.1.3 To contact you about our Services, for example, by phone, email or post or by responding to social media posts that you have directed to us; we use your personal data to provide clarification and assistance in response to your communications.
  - 5.1.4 To 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 part, this will not affect your ability to use our Services.

## **6 Who has access to data?**

- 6.1 Your information may be shared internally, including with members of staff, if access to the data is necessary for the proper performance of their roles.
- 6.1.1 Shared internally also includes sharing your information with officers and staff of our associate company Woodley Equipment Company, Inc if the access is necessary for the proper performance of their roles.
- 6.2 We may share your data with third parties:
- 6.2.1 if the law or a public authority says we must share the personal data;
  - 6.2.2 if we need to share personal data in order to establish, exercise or defend our legal rights; and
  - 6.2.3 to aid with the managing of your order process, for example: couriers.
- 6.3 We may also share your data with third parties in the context of a sale of some or all of the business, in these circumstances the data will be subject to confidentiality agreements.

## **7 How does Woodley protect data?**

- 7.1 Woodley takes the security of your data seriously. We have policies and controls in place, including firewalls and data encryption, to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees in the proper performance of their duties.
- 7.2 Where Woodley engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of the data.
- 7.2.1 Our Websites may contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any personal data on a

website as we do not accept any responsibility or liability for websites of other organisations.

- 7.3 However, whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us. The personal data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). We will put in place appropriate protection to ensure your personal data remains adequately protected and is treated in line with this Policy.

## 8 How long will we keep your data?

- 8.1 We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).
- 8.2 In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 8 years.

## 9 Cookies and similar technologies

- 9.1 Woodley 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.
- 9.1.1 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.
- 9.1.1.1 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.
- 9.1.1.2 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.
- 9.1.2 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** (<http://www.allaboutcookies.org>) and **Your Online Choices** (<http://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, proceed to checkout.

## 10 Your rights

- 10.1 As a data subject you have a number of rights. You can:
- 10.1.1 access and obtain a copy of your data on request;
- 10.1.2 require Woodley to change incorrect or incomplete data;
- 10.1.3 require Woodley to delete or stop processing your data, for example where the data

is no longer necessary for the purposes of processing; and

10.1.4 object to the processing of your data where Woodley is relying on its legitimate interests as the legal ground for processing.

10.2 If you would like to exercise any of these rights please contact the Business Support Administrator at the address detailed in 2.1.

10.3 If you believe that Woodley has not complied with your data protection rights you can complain to the Information Commissioner.

## **11 Automated decision making.**

11.1 No company decisions relating to customers or suppliers are based solely on automated decision-making systems.

## **12 Changes to this policy**

12.1 We reserve the right to change this Policy at any time, so please check back regularly to keep informed of updates to this Policy.