

Privacy Policy

We are committed to ensure that your privacy is protected. Should we ask you to provide specific information from which you can be identified, we assure you that it will only be used in accordance with this privacy notice and in compliance with the GDPR data protection regulations.

This privacy notice aims to give you information on how Westfield Electronics / Westfield Distribution Ltd collects and processes your personal data including any data you may provide through this website, purchase a product or service or take part in any prize draw or competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Westfield Distribution Ltd is the controller and responsible for your personal data (collectively referred to as

["Westfield Distribution Ltd"], "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

privacy@westfield.co.uk Telephone +44(0) 1488 685183

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. privacy@westfield.co.uk Telephone +44(0) 1488 685183

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, this helps us provide the best possible service to you, our valued customer.

Data security

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 and non disclosure.

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.

Website:Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Our Contact Details and who we are:

Westfield Distribution Ltd

Registered Address:

Unit 2, Station Yard, Station Road, Hungerford, Berkshire, RG17 0DY, U.K.

Phone: +44(0) 1488 685183

Westfield Distribution Ltd is a UK registered company and is required to conform to the current data protection laws in the UK.

The regulatory authority in the UK is the Information Commissioner's Office ("ICO").

Explanation and Understanding of our Privacy Policy / Notice

A full definition of the terms used in this Privacy Notice and your rights you can refer to the ICO website (ico.org.uk)

We collect your personal information when:

You talk with our teams on the telephone, via email, business card, sales rep visit, fax, or any other form of electronic data system.

When you purchase products or services from us or seek our advice.

When you sell products or services to us.

When you ask us for more information about a product or service, or contact us with a question or complaint.

When you browse or visit our websites we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out the number of visitors to various parts of the site. This information is only processed in a way which does not identify anyone.

Personal Data we hold and Why ?

We hold personal data so that we can stay in touch with you whilst we trade with active contractual agreements we may have with you and the company you may represent. We will also retain personal details so that we may have reference to you should we trade again in the future.

We hold minimal amounts of personal data about you; your name and contact information, provided by you or the organisation you may work for.

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, and gender.

Contact Data includes billing address, delivery address, email address Organisation name and telephone numbers.

Organisation Financial Data includes bank account details, credit rating, payment history.

Organisation Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Profile Data includes your purchases or orders made by you, your interests, preferences, feedback and survey responses.

Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Third parties or publicly available sources of Data: We may receive personal data about you and your organisation or the Directors of your organisation from various third parties and public sources as set out below **Technical Data from the following parties:**

Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.

Identity and Contact Data from data brokers or aggregators based inside the EU.

Identity and Contact Data from publicly available sources [such as Companies House and the Electoral Register based inside the EU.

Use of your Personal Information:

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to 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 use your personal data for the following reasons:

The legal basis for this processing is Article 6(1)(a) GDPR and Article 6(1)(b) GDPR.

Processing your enquiries and orders for the goods and services you buy from us.

Keeping you updated with your enquiries, and order progress

Processing the goods and services we buy from you.

Offering goods and services we know you buy from us regularly and ongoing until you ask us to stop.

Keeping you updated with new product and service availability, special offers, stock clearances, competitions, prize draws until you ask us to stop.

Promotional offers from us Email Marketing.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to

you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us [or if you provided us with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing.

We never send out information that is not relevant and proportional to the products and services that we supply and in the interest of our clients.

Periodically contacting you to review the status of any purchasing cycle, advising of any product supply lead time issues or obsolescence, last time buys, or to update our database with your contact and business details.

Periodically contacting you to review the status of your organisations credit account, especially if it should become dormant to ask if such account be held open or closed.

Telesales to existing clients and cold calling potential clients (cold calls)

Inbound and outbound calls depending on the content, can be considered as the processing of personal information. In terms of cold-calling or marketing calls, consent is not required as it is considered as business-critical and therefore a 'legitimate interest'.

Live calls can be made to any business number that is not registered on the Telephone Preference Service (TPS) or Corporate TPS (CTPS) or has previously objected to future calls. In practice, this means that live calls should be screened against the TPS and CPTS to ensure GDPR compliance.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

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.

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.

Disclosures of your personal data

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers and Sharing your personal information:

Westfield Electronics & Westfield Distribution Limited
Unit 2, Station Yard, Station Road, Hungerford, Berkshire, RG17 0DY
Telephone: 01488 685183 Fax: 01488 685430 Email: sales@westfield.co.uk
Registered in England No: 2102267 ISO 9001:2015 by NQA No: 6595

We do not transfer your personal data outside the European Economic Area (EEA) without your consent, Except for marketing information which is handled through Mailchimp based in the U.S

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

All data collected is for internal use only, occasionally your contact details Name, organisation name and address, email address and telephone numbers may be passed to one of our suppliers for direct technical or price support when requested by you when necessary, to enable fulfilment of your enquiries and orders.

Should you or the business you represent, conduct transactions with us then we will also maintain such data as is necessary for day to day administration of your account.

We do not share our marketing data or any of your personal data, contact details or communication preferences with third parties. We store this information on a secure internal database to keep your data safe.

For general mailings we use a third party provider, Mailchimp, to deliver our e-newsletters. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see Mailchimp's privacy notice <https://mailchimp.com/legal/privacy/>

If you choose to unsubscribe from our mailing list your details will be updated and your request to receive mailings removed from the internal database and from Mailchimp.

How long do we keep your personal information?

We believe in building strong close working partnerships with you and the organisations you work for or with. We will hold your personal data whilst

we continue working with your organisation and in archive thereafter or until you ask us to remove your personal data details from our records.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for [six] years after they cease being customers for [tax] purposes.

If you want us to change details or don't want us to hold your personal contact details any longer

You are welcome to ask your sales or finance contact to change, amend, remove or check the personal contact information held about you in our records alternatively email us privacy@westfield.co.uk

If you have any concerns, complaints, queries or questions about our Privacy Notice or the personal contact data we hold, you can email us at privacy@westfield.co.uk

Your legal rights

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

Request access to your personal data

Request correction of your personal data

Request erasure of your personal data

Object to processing of your personal data

Request restriction of processing your personal data

Request transfer of your personal data

Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us.

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 may refuse to comply with your request in these circumstances.

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

Service providers acting as processors based in the United Kingdom who provide IT and system administration services. Examples: website hosting, Mailchimp email marketing.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

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.

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.

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 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.

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 particular 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.

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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use

of your data but we need to verify whether we have overriding legitimate grounds to use it.

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.

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.

What if we change details within our Privacy Notice?

We will update this page with any changes to our Privacy Notice.

Should any significant changes be made to this Privacy Notice, we will post notification on our websites.

This Privacy Notice was last updated 13th July 2018

