



# Privacy Notice

**WMS is committed to protecting and respecting your privacy.**

This Privacy Notice together with our Terms of Use and any other documents referred to in it sets out how WMS collects, uses, maintains and discloses Personal Data, including any information provided through our website(s) (the “**Website**”).

Your privacy is of the utmost importance to us. Please read this Privacy Notice carefully to understand our views and practices regarding your personal data and how we will treat it.

Whenever you provide personal information, we are legally obliged to use it in accordance with the laws concerning the protection of personal information.

## **Who we are**

**WEST MARCH SYSTEMS LIMITED** is a limited company registered in England under company no. 06245182, and with its registered address at 4 Mason Court Gillan Way, Penrith 40 Business Park, Penrith, Cumbria, United Kingdom, CA11 9GR (“**WMS**”)

For the purposes of the Data Protection Act 1998, the General Data Protection Regulations and any other applicable data protection and privacy laws and regulations (“**Data Protection Legislation**”), WMS will be the ‘data controller’ for all personal information that we determine the means and purpose of processing. We are registered with the Information Commissioners Office under registration number Z1500403.

By “**Personal Data**” we refer to information collected or held by WMS, that identifies and relates to you as an individual.

## **Information we may collect**

We may collect personal information about you when you request our services, including:

- your name;
- postal address;
- invoicing details/address;
- information regarding the services you request;
- supplementary information you provide us about yourself when contacting us;
- email address; and
- telephone numbers (including mobile)

When you provide an application or become a WMS staff member we may collect the following personal data:

- your name;
- home address;
- contact details;
- bank account details; and
- information required to complete our DBS checks.

When you become a supplier of services to WMS, we may collect personal information such as:

- your name;

- contact details and business information; and
- invoicing and payment details.

### **What do we do with the information we collect?**

We will use your personal information for a number of purposes including:

- internal record keeping;
- to carry out any obligations owed to you through the use of our Website and in respect of any contracts entered into between you and us;
- to give you information that you request from us and to improve our services;
- to allow us to successfully recruit staff and perform our employment responsibilities;
- to notify you about changes to our services;
- to ensure that the content from our Website is presented in the most effective manner for you and your computer;
- any relevant troubleshooting, testing or statistical analysis as appropriate; and
- to keep the Website secure.

Where we have your permission to do so, we may also use the information collected to:

- provide you with information about our services that we offer via promotional communications; and
- keep you up to date with features on the Website,

however, you can opt-out of any of these data uses at any time by emailing [info@westmarchsystems.co.uk](mailto:info@westmarchsystems.co.uk).

### **Data retention**

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.

We retain active customer data for the length of the contract to supply you with our services and then for two years after termination of this agreement. We retain this information under our legitimate interests to service enquiries from former customers. After this period, the data is permanently destroyed.

### **Legal basis of processing**

We will only process your information for as long as we have a relevant legal basis to do so. This is usually in order to provide you with the contractual services you have requested from WMS or if you have provided us with adequate consent to process your information for other purposes.

If we choose to process your information under the legal basis of legitimate interests, we will always inform you of our legitimate business interest and your right to object.

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 at [info@westmarchsystems.co.uk](mailto:info@westmarchsystems.co.uk).

### **Protecting your information**

We are committed to ensuring that your information is secure and we have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we collect online.

All the Personal Data collected by us and stored electronically is held on a secure server in the UK only. Where required, this information is encrypted for additional security. We use computer safeguards such as firewalls and data encryption and WMS holds both ISO27001 and Cyber Essentials Plus certification. We enforce physical access controls to our buildings and files, and we authorise access to Personal Data only for those employees who require it to fulfil their job responsibilities.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

### **Transfer of data outside of the UK**

We shall not transfer any personal data to any country outside of the United Kingdom unless we ensure that such personal data is subject to an adequate level of protection and appropriate legal safeguards in accordance with Data Protection Legislation.

### **Sharing your information with others**

Please be assured that we will not share your information for any other reason unless we are required by law or permitted to do so under this Privacy Notice. The main circumstances in which we will be permitted or required to disclose this is by law will be by court order, to government bodies and law enforcement agencies. However, sometimes we may share your information with third parties in the following ways:

- we may use carefully selected sub-processors to help us collect, store or manage your information. This will always be managed under the terms of a written data processing agreement;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website; and
- if WMS is acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets. We process your personal information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal information in this way, the relevant seller or buyer of our business may not be able to provide services to you.

### **Access to your Personal Data**

You have rights in relation to any Personal Data that we hold about you. If you wish to access your Personal Data you may make a formal subject access request by contacting WMS.

The information you request must relate to you or another person that you have authority to act on their behalf. WMS will require a confirmation of your ID prior to providing any information about the data we hold. If you are unable to provide sufficient information to prove your ID, WMS reserves the right to refuse your request for access to Personal Data. The rights you have in relation to the Personal Data we hold regarding you are:

- the right to rectify any inaccuracies in the information we hold;
- the right to erasure of information in specific circumstances;
- the right to request transfer of your information to another controller; and
- the right to object to processing in certain circumstances.

If you have provided us with consent to process your information, you always reserve the right to withdraw this consent via the method detailed in the paragraph below. We are committed to ensuring that your wishes are respected and upon notification that you wish to withdraw your consent, WMS will immediately cease processing the information in question.

Please send your request to WMS by emailing [info@westmarchsystems.co.uk](mailto:info@westmarchsystems.co.uk). 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.

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

We may change this Privacy Notice at any time to ensure it always accurately reflects the way we collect, use and safeguard your Personal Data.

Please check this notice from time to time to ensure you are aware of any updates we may have made to our Personal Data handling practices. We will endeavour to notify all of our current clients of any updates to this notice via email and we will post the relevant announcement on our website homepage.

We recommend that you print a copy of this page for your reference.

### **Cookies**

This Website uses cookies to help us recognise different users of the Website and to provide users of the Website with a good experience when using it. Please see our **Cookies Policy** for further information

### **How can you make a complaint?**

Please note that if you are not satisfied with the processing of your personal data as set out in this Privacy Notice, please contact us at [info@westmarchsystems.co.uk](mailto:info@westmarchsystems.co.uk).

You have the right to issue a complaint directly with the Information Commissioners Office, the data protection supervisory authority for England and Wales <https://ico.org.uk/make-a-complaint/>

### **Contacting us**

Please contact us at [info@westmarchsystems.co.uk](mailto:info@westmarchsystems.co.uk) if you have any questions, comments or requests regarding this Privacy Notice.