

GDPR - Our Privacy Notice

1. Background

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all products and services, and instances where we collect your personal data.

This privacy notice applies to personal information processed by or on behalf of Westronics Ltd.

Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – www.westronics.co.uk

Data Protection Officer

Westronics Limited, 11-12 Marcus Close, Reading, Berkshire, RG30 4EA are a data controller of your personal data. We have a dedicated data protection officer ("DPO"). You can contact the DPO using the details below or by writing to the above address, marking it for the attention of the DPO.

2. What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our products and services, if relevant, includes:

Personal and contact details, such as title, full name, contact details and contact details history.

Nominated Key holders such as title, full name, contact details and contact details history.

Records of your contact with us such as via the phone number or email address.

Products and services you hold with us, as well the associated payment methods used.

Sales and Service history such as any site attendance by our field engineers or surveyors.

Information we obtained from third parties, including information about insurance risk, pricing, claims history, instances of suspect fraud and usage history.

Personal information which we obtain from Credit Reference Agencies and Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' below), including public (for example, defaults, CCJs) and shared credit history, financial situation and financial history.

Fraud, debt and theft information, including details of money you owe, suspected instances of fraud or theft, and details of any devices used for fraud.

Information about your property, such as location, value, number of rooms, property type and building work you've had done.

Information about your property occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property where you live at the time of your application.

Your residency and/or citizenship status, if relevant, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK.

Where relevant, **information about any guarantor** which you provide in any application.

Third party transactions; such as where a person other than the account holder uses the service, information about that person and the transaction.

Tax information, if relevant.

3. What is the source of your personal information?

We'll collect personal information from the following general sources:

From you directly.

Information generated about you when you use our products and services.

Business partners (for example, financial services institutions, insurers).

From other sources such as Fraud Prevention Agencies, Credit Reference Agencies, other lenders, HMRC, DWP, publically available directories and information (for example, telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organizations to assist in prevention and detection of crime, police and law enforcement agencies.

4. What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 1 above, for the following purposes:

Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms.

Managing products and services relating to that the product or service, or application for one.

Updating your records, tracing your whereabouts and recovering debt.

Managing any aspect of the product or service.

To perform and/or test the performance of, our products, services and internal processes.

To improve the operation of our business.

To follow guidance and best practice under the change to rules of governmental and regulatory bodies.

For management and auditing of our business operations including accounting.

To monitor and to keep records of our communications with you and our staff (see below).

To administer our good governance requirements and compliance obligations or administration required for Annual General Meeting ("AGM") processes.

For market research and analysis and developing statistics.

For direct marketing communications and related profiling to help us to offer you relevant products and service, including deciding whether or not to offer you certain products and service. We'll send marketing to you by SMS, email, phone, post, social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match). Offers may relate to any of our products and services.

To develop new products and services and to review and improve current products and services.

To comply with legal and regulatory obligations, requirements and guidance.

To share information, as needed, with business partners (for example, financial services institutions, insurers), account beneficiaries, service providers or as part of providing and administering our products and services or operating our business.

To facilitate the sale of one or more parts of our business.

5. What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

1. Where it is needed to provide you with our products or services, such as:

- a) Assessing an application for a product or service you hold with us, including considering whether or not to offer you the product, the price, the payment methods available and the conditions to attach.
- b) Managing products and services you hold with us, or an application for one.
- c) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate).
- d) Sharing your personal information with business partners and services providers when you apply for a product to help manage your product.
- e) All stages and activities relevant to managing the product or service including enquiry, application, administration and management of accounts.

2. Where it is in our legitimate interests to do so, such as:

- a) Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate).
- b) To perform and/or test the performance of, our products, services and internal processes.
- c) To follow guidance and recommended best practice of government and regulatory bodies.
- d) For management and audit of our business operations including accounting.
- e) To carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after that. Where you have been introduced to us by a broker or other intermediary they may do these searches on our behalf.
- f) To carry out monitoring and to keep records of our communications with you and our staff (see below).
- g) To administer our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for AGM processes.
- h) For market research and analysis and developing statistics.
- i) For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and services. We will send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match).
- j) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses.
- k) Where we need to share your personal information with people or organizations in order to run our business or comply with any legal and/or regulatory obligations.

3. To comply with our **legal obligations**.
4. With your **consent or explicit consent**:
 - a) For some direct marketing communication.
5. For a **public interest**, such as:
 - a) Processing of your special categories of personal data such as about your health, criminal records information (including alleged offences), or if you are a vulnerable customer.

6. When do we share your personal information with other organizations?

We may share information with the following third parties for the purposes listed above:

Alarm Receiving Centre (ARC).

Business partners (for example, financial services institutions, insurers), account beneficiaries, or others who are a part of providing your products and services or operating our business.

Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme.

Other organizations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions.

Credit Reference and Fraud Prevention Agencies (see below).

7. How and when can you withdraw your consent?

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

8. Is your personal information transferred outside the UK?

We're based in the UK but sometimes your personal information may be transferred outside the European Economic Area. If we do so we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

9. How do we share your information with credit reference agencies?

To process your application, we'll perform credit and identity checks on you with one or more credit reference agencies (**CRAs**). We'll use this information to:

Assess your creditworthiness and whether you can afford to take the product.

Verify the accuracy of the data you have provided to us.

Prevent criminal activity, fraud and money laundering.

Manage your account(s).

Assess payment methods available to you.

Trace and recover debts.

Make sure any offers provided to you are appropriate to your circumstances.

We'll continue to exchange information about you with CRAs while you have a relationship with us. We'll also notify the CRAs about your settled accounts. If you borrow and don't repay in full and on time, CRAs will record the outstanding debt. This information may be given to other organizations by CRAs. **The identities of the CRAs, their role as fraud prevention agencies, and the data they hold.**

10. How do we share your information with Fraud Prevention Agencies?

To learn more about how credit reference and fraud agencies use your personal data please contact us.

11. What should you do if your personal information changes?

You should tell us so that we can update our records using the details in the Contact Us section of our website. We'll then update your records if we can.

12. Do you have to provide your personal information to us?

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

13. Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

14. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations.

For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or retention periods in line with legal and regulatory requirements or guidance.

15. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not.

The right of data portability is only relevant from May 2018.

The right **to be informed** about the processing of your personal information.

The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**.

The right **to object** to processing of your personal information.

The right **to restrict processing** of your personal information.

The right **to have your personal information erased** (the “right to be forgotten”).

The right to **request access** to your personal information and to obtain information about how we process it.

The right to **move copy or transfer your personal information** (“data portability”).

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

16. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the contact us section of our website to exercise these rights.

Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the Contact Us section of our website. Alternatively, you can write to Westronics Limited, 11-12 Marcus Close, Reading, Berkshire, RG30 4EA.