

GDPR Customer and supplier privacy notice (UK)

WHAT IS THE PURPOSE OF THIS DOCUMENT?

James Gordons Ltd. Is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice is applicable to you if you are a customer, supplier or prospective customer or supplier of James Gordons Ltd. It is intended to make you aware of how and why your personal data will be used in the conduct of our business activities and to provide you with certain information that must be provided under the General Data Protection Regulation (GDPR).

DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Customers In connection with your query about our products and services, or in connection with your order: we will collect, store, and certain information about you.

Suppliers In connection with your supply of products and services to us: we will collect, store, and certain information about you.

We have grouped together the various kinds of personal data which we may collect, as follows:

- Identity data: your first name and surname, title, position within your organisation (if relevant) and, where provided, date of birth and gender.
- Contact data: including billing address and delivery address, email address and telephone numbers.
- Financial data: including bank details and other payment details (which will only be used for payment or payment processing purposes).
- Account/transaction data: details of your previous orders or supply to us, other details of products and services you have purchased from us or that we have purchased from you and payment, billing and credit history details.

We do not collect or hold any ‘special category’ data about you (such as information about your race or ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership or health).

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

Customers We only collect information about you when you contact us with a view to requesting or ordering products or services from James Gordons Ltd..

Suppliers We only collect information about you when we contact you with a view to requesting or ordering products or services from you.

We collect personal information from the following sources:

- You, as the representative of the business with whom we are doing business.
- Third parties or a publicly accessible source, such as your business website or the website of a trade association of which you are a member.

HOW WILL WE USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- Communicate with you in connection with the supply of products and services. This is usually either pursuant to a contract between us or in anticipation of a contract being entered into.
- Comply with legal or regulatory requirements.

AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

DATA SHARING

We will only share your personal information with third parties:

- To comply with our agreement to purchase or supply products and services pursuant to the relevant order/specifications;
- To instruct third party professional advisers such as insurers, accountants or lawyers;
- On a disposal of James Gordons Ltd or its business (or of any part of its business).

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

DATA SECURITY

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

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

DATA RETENTION

We will retain your personal information for as long as is necessary for the purposes of fulfilling the purposes for which it was collected and to fulfil our legal obligations. While you, or the business you represent, remain a customer or supplier of James Gordons Ltd, we will retain your information in order to continue providing our products and services to you or purchasing products and services from you. We will not retain more information than we need. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised the right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact dataprotection@jgordon.co.uk or the company secretary in writing.

DATA PRIVACY QUERIES

If you have any questions about this privacy notice or how we handle your personal information, please contact the Company Secretary or dataprotection@jgordon.co.uk. 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 but we hope that, should any issues arise, you will speak to us in the first instance.