

Privacy Statement

INTRODUCTION & SCOPE OF THIS PRIVACY POLICY

Sanderson Watts Associates Ltd (SWA) and any other SWA group companies understands that your privacy is important to you and that you care about how your personal data is used and shared online.

We respect and value the privacy of everyone who visits our website(s) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our website(s). If you do not accept and agree with this Privacy Policy, you must stop using our website(s) immediately.

WHY THE POLICY EXISTS

This privacy policy ensures that SWA:

- Complies with EU Regulation 2016/679 and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach.

LAW

The EU Regulation 2016/679 – the General Data Protection Regulation describes how organisations must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The EU Regulation 2016/679 is underpinned by seven important principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

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1. DEFINITIONS & INTERPRETATION

In this Policy, the following terms shall have the following meanings:

Account

Means an account required to access and/or use certain areas and features of our website(s).

Cookie

Means a small text file placed on your computer or device by our website(s) when you visit certain parts of our website(s) and/or when you use certain features of our website(s).

Cookie Law

Means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Personal Data

Means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via our website(s). This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”).

We/Us/Our/Ourselves

Means Sanderson Watts Associates Ltd, a limited company registered in England under company number 04107494, and any other SWA group companies whose registered address is:

Century House
100 Chapel Lane
Wigan
WN3 4HG

And whose main trading address is:

Century House
100 Chapel Lane
Wigan
WN3 4HG

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2. INFORMATION ABOUT US

Our website(s) is operated & controlled by us and designed, hosted and supported by Stomm Ltd.

3. WHAT DOES THIS POLICY COVER?

This Privacy Policy applies only to your use of our website(s). Our website(s) may contain links to other website(s). Please note that we have no control over how your data is collected, stored, or used by other website(s) and we advise you to check the privacy policies of any such website(s) before providing any data to them.

4. YOUR RIGHTS

As a data subject, you have the following rights under the GDPR, which this policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of personal data
- The right of access to the personal data we hold about you (see section 12)
- The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 14)
- The right to be forgotten i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 14)
- The right to restrict (i.e. prevent) the processing of your personal data
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation)
- The right to object to us using your personal data for particular purposes
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 14 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. WHAT DATA DO WE COLLECT?

Depending upon your use of our website(s), we may collect some or all of the following personal, and non-personal data (please also see section 13 on our use of Cookies and similar technologies):

- Name & contact information such as email addresses, postal address, telephone & mobile numbers
- Your IP address
- The date and time of the visit and how long you remained on our website(s)
- If applicable, the referral URL (the site from which the visitor has come)
- The pages visited on our website(s)
- Information about the device and browser (such as, browser type, version, operating system, etc)

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6. HOW DO WE USE YOUR DATA?

- a) All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7 below.
- b) Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:
 - Supplying our products and services to you (please note that we require your personal data in order to enter into a contract with you)
 - Replying to emails from you
 - Any other legitimate reasons.
- c) With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email, telephone, and/or post with information, news and offers on our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- d) You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.
- e) We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods:
 - i. Personal data will not be held for more than six years after it ceases to be current, unless there is a specific reason for doing so.

7. HOW AND WHERE DO WE STORE YOUR DATA

- a) Your data will only be stored in the UK.
- b) We are committed to protecting your personal information and implement appropriate technical and organisational security measures to protect it against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage.

8. DO WE SHARE YOUR DATA?

- a) Subject to section 8b, we will not share any of your data with any third parties for any purposes.
- b) In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

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9. WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

- a) We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.
- b) In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

10. HOW CAN YOU CONTROL YOUR DATA?

- a) In addition to your rights under the GDPR, set out in section 4, when you submit personal data via our website(s), you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).
- b) You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. YOUR RIGHT TO WITHHOLD INFORMATION

- a) You may access certain areas of our website(s) without providing any data at all. However, to use all features and functions available on our website(s) you may be required to submit or allow for the collection of certain data.
- b) You may restrict our use of Cookies. For more information, see section 13.

12. HOW CAN YOU ACCESS YOUR DATA?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge within 30 days. Please contact us for more details at dataprotection@sandersonwatts.com or using the contact details below in section 14.

13. OUR USE OF COOKIES

- a) Our website(s) may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our website(s) and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- b) All Cookies used by and on our website(s) are used in accordance with current Cookie Law.
- c) Before certain Cookies are placed on your computer or device, you will be shown a notification requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are

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enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our website(s) may not function fully or as intended.

- d) Certain features of our website(s) depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13g, but please be aware that our website(s) may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- e) Our website(s) uses analytics services provided by Google Tag Manager. Website(s) analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our website(s) is used. This, in turn, enables us to improve our website(s) and the products and services offered through it. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our website(s), it does enable us to continually improve our website(s), making it a better and more useful experience for you.
- f) In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- g) You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our website(s) more quickly and efficiently including, but not limited to, login and personalisation settings.
- h) It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. CONTACTING US

If you have any questions about our website(s) or this Privacy Policy, please contact Us by email at dataprotection@sandersonwatts.com, by telephone on 01942 491777, or by post at Century House, 100 Chapel Lane, Wigan, WN3 4HG. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

15. CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website(s) and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website(s) following the alterations. We recommend that you check this page regularly to keep up-to-date.