

# **Privacy policy**

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, service users, individual customers and customer personnel.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 Our website incorporates privacy controls which affect how we will process your personal data.
- 1.4 In this policy, "we", "us" and "our" refer to Watson, Wild and Baker Limited only.

## 2. The personal data that we collect

- 2.1 In this Section 2 we have set out the general categories of personal data that we process.
- We may process data enabling us to get in touch with you ("contact data"). The contact data may include your name, email address and telephone. The source of the contact data is you.
- 2.3 We may process information contained in or relating to any communication that you send to us or that we send to you ("communication data"). The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.
- 2.4 We may process data about your use of our website ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

# 3. Purposes of processing and legal bases

- 3.1 In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 3.2 Relationships and communications We may process contact data and communication data for the purposes of communicating with you (excluding communicating for the purposes of direct marketing) by email and telephone. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, service users, individual customers and customer personnel.
- 3.3 Direct marketing We may process contact data for the purposes of creating, targeting and sending direct marketing communications by email and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.
- 3.4 **Research and analysis** We may process usage data for the purposes of researching and analysing the use of our website. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website.
- 3.5 **Record keeping** We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access

to all the information we need to properly and efficiently run our business in accordance with this policy.

- 3.6 **Insurance and risk management** We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.7 **Legal claims** We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.8 **Legal compliance and vital interests** We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

# 4. Retaining and deleting personal data

- 4.1 This Section 4 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.3 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### 5. Your rights

- 5.1 In this Section 5, we have listed the rights that you have under data protection law.
- 5.2 Your principal rights under data protection law are:
  - (a) the right to access you can ask for copies of your personal data;
  - (b) **the right to rectification** you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
  - (c) the right to erasure you can ask us to erase your personal data;
  - (d) **the right to restrict processing** you can ask us to restrict the processing of your personal data;
  - (e) the right to object to processing you can object to the processing of your personal data;
  - (f) **the right to data portability** you can ask that we transfer your personal data to another organisation or to you;
  - (g) **the right to complain to a supervisory authority** you can complain about our processing of your personal data; and
  - (h) **the right to withdraw consent** to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

- 5.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <a href="https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/">https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/</a>.
- 5.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

#### 6. About cookies

- 6.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 6.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 6.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

#### 7. Cookies that we use

- 7.1 We use cookies for the following purposes:
  - (a) **authentication and status** we use cookies to identify you when you visit our website and as you navigate our website.
  - (b) security we use cookies as an element of the security measures used to protect our website and services generally.
  - (c) **analysis** we use cookies to help us to analyse the use and performance of our website and services.
  - (d) **cookie consent** we use cookies to store your preferences in relation to the use of cookies more generally.

### 8. Cookies used by our service providers

- 8.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 8.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <a href="https://www.google.com/policies/privacy/partners/">https://www.google.com/policies/privacy/partners/</a> and you can review Google's privacy policy at <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>.

### 9. Managing cookies

- 9.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
  - (a) <a href="https://support.google.com/chrome/answer/95647">https://support.google.com/chrome/answer/95647</a> (Chrome);
  - (b) <a href="https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences">https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences</a> (Firefox);

- (c) <a href="https://help.opera.com/en/latest/security-and-privacy/">https://help.opera.com/en/latest/security-and-privacy/</a> (Opera);
- (d) <a href="https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies</a> (Internet Explorer);
- (e) <a href="https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri1471/mac">https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri1471/mac</a> (Safari); and
- (f) https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).
- 9.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 9.3 If you block cookies, you will not be able to use all the features on our website.

## 10. Our details

- 10.1 This website is owned and operated by Watson, Wild and Baker Limited.
- 10.2 We are registered in England and Wales under registration number 06579974, and our registered office is at Rourke House, Watermans Business Park, The Causeway, Staines, TW18 3BA.