

Wirewound Limited

Wirewound Privacy Notice

v1.3

Privacy Notice

John Lawrence Lewis
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Document Information

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Version	Date	Author	Description of change
1.0	09/01/2023	John Lawrence Lewis	Published
1.1	11/10/2023	John Lawrence Lewis	Added audit recommendations
1.2	14/05/2024	John Lawrence Lewis	Added further audit recommendations
1.3	18/06/2024	John Lawrence Lewis	Added further audit recommendations

Introduction

Welcome to Wirewound Limited's privacy notice.

Wirewound Limited (Wirewound) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you use our products and services and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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Purpose of this privacy notice

This privacy notice aims to give you information on how Wirewound collects and processes your personal data through your use of its products and services, including any data you may provide when using a product or service.

This website is not intended for children, and we do not knowingly collect data relating to children through our website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Wirewound is the controller and responsible for your personal data (collectively referred to as "Wirewound", "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer using the details set out below.

Contact details:

Our full details are:

Full name of legal entity: Wirewound Limited

Name or title of Data Protection Officer: John Lawrence Lewis

Email address: dpo@wirewound.co.uk

Postal address: Wirewound Ltd, Middleham House 2-3, St. Marys Court, YORK, YO24 1AH.

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 10th October 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Personal data used for Wirewound products and services

In order to provide its phone number and address search we publish personal data from the databases listed below. We have assessed the basis on which we process such personal data and the lawful basis for processing is listed next to the type of data in the table below:

Database from which the data is obtained	Lawful basis for processing such data
Full Electoral Register (Experian)	Legitimate Interest

Please refer to Privacy Policy (Privacy and Your Data | Experian) to find out more information about how Experian collect and manage data.

We do not issue a privacy notice to the data subjects whose data we use for our services due to the disproportionate effort which would be required to do. We have carried out a data protection impact assessment in order to assess the effect of this decision. We provide the required information in this privacy policy on our website.

We will retain and publish the personal data only for so long as the lawful basis for processing set out above valid.

If you would like your personal data removed from our products and services, please contact dpo@wirewound.co.uk. Please note that you may also wish to contact the organisations who hold such data (e.g. Experian) to request that your records are also be removed from their database.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (**anonymous data**).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name and job title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this service.
- **Profile Data** includes your username and password and search credits purchased by you.

- **Usage Data** includes information about how you use our search services.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data under the terms of a contract, we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - create an account on our systems;
 - purchase search credits to use our service;
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our services, we automatically collect:
 - Identity Data and Technical Data (IP address) about you through search logs;

- Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources. We may receive personal data about you from third parties as set out below:**
 - Financial and Transaction Data from providers of payment and delivery services such as Braintree based outside the EU.

How we use personal data we collect from you

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by emailing dpo@wirewound.co.uk

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing such data
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When you register to use our service	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Performance of a contract with you
<p>To provide services to you:</p> <p>a. Manage payments, fees and charges</p> <p>b. Collect and recover money owed to us</p>	<ul style="list-style-type: none"> • Identity • Contact • Transaction • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to perform contracts with your employer, to recover debts due to us)
<p>To manage our relationship with you which will include:</p> <p>a. Notifying you about changes to our terms or privacy policy</p> <p>b. Notifying you about changes to our service.</p>	<ul style="list-style-type: none"> • Identity • Contact • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests
To administer and protect our business and our services(including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation
To deliver relevant content to you and measure or understand the effectiveness of the services we provide	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Usage 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define types of customers for our products and services, and to develop our business and to inform our marketing strategy)
To monitor uses of our services	<ul style="list-style-type: none"> • Identity • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to monitor the uses of our services and to avoid fraudulent or unlawful use of our services).
To provide services that support fraud prevention and identity verification	<ul style="list-style-type: none"> • Identity 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need from the Service. This is how we decide which products, services and offers may be relevant for you (we call this marketing). When we update the service, we will contact you by e-mail with information about the updated service.

Change of purpose

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 email dpo@wirewound.co.uk

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Removal of your personal data and opting out of marketing

Removal of personal data

If you would like your personal data removed from our products and services, please email dpo@wirewound.co.uk.

Please note that we are NOT able to process requests received through third parties. If you send a removal request via a third-party website then we will ask you to email dpo@wirewound.co.uk as we need certain information from you to ensure that we are removing the records of the correct person. We recommend that you carefully check the credentials of any third party which offers to assist you in a removal request in order to ensure that they are legitimate and can provide the service advertised.

Please note that as the data we use is from a publicly available database (as listed in paragraph 2 of this privacy notice) you may also wish to contact the organisations who hold such data (e.g. your local council) to request that your records are also removed from their database.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing dpo@wirewound.co.uk at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the purchase of products or services from us.

Disclosures of your personal data

We will share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Search logs

We keep logs of all searches conducted by users of our products and services including Identity Data (where we have it), and Technical Data (being the IP (Internet Protocol) address from which a user session was conducted). This information may be used to assist in improving our products, to avoid fraudulent and unlawful uses of our products and to develop our services.

We reserve the right to pass such search logs to:

- a data subject who makes a subject access request if we believe it is reasonable to provide such logs to the data subject without obtaining your consent; and/or
- the police and other law enforcement agencies if they issue a request under the Data Protection Act 2018, Schedule 2, Part 1(2).

International transfers

Data can be transferred within the European Economic Area (**EEA**) and with designated territories that are signatories to Privacy Shield Security framework e.g. United States

Data security

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

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

Data retention

How long will you use my personal data for?

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.

By law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

If you wish to exercise any of the rights set out above, please email dpo@wirewound.co.uk

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

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.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.