

General

This is the Website Privacy Policy of XMA Ltd.

XMA Limited collects, uses and is responsible for certain personal information about you.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

XMA, we, us, our	Shall mean XMA Limited
Our Privacy Compliance Officer	Emily Garvey (data.protection@XMA.co.uk)
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

The personal information we collect and use

We may collect and use the following personal information about you:

- your name and contact information, including email address and telephone number and company details
- Information to enable us to check and verify your identity, eg your date of birth
- your gender information, if you choose to give this to us
- location data, if you choose to give this to us
- your billing information, transaction and payment card information
- your personal or professional interests
- your professional online presence, eg LinkedIn profile
- your contact history, purchase history and saved items
- information from accounts you link to us, eg Facebook
- information to enable us to undertake credit or other financial checks on you
- Information about how you use our website, IT, communication and other systems
- your responses to surveys, competitions and promotions

This personal information is required to provide our products and services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing these to you.

How your personal information is collected

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website and apps. However, we may also collect information:

- From publicly accessible sources, eg Companies House or HM Land Registry;
- Directly from a third party, eg:
 - sanctions screening providers;
 - credit reference agencies;
 - customer due diligence providers;
- From a third party with your consent, eg your bank or building society
- From cookies on our website—for more information on our use of cookies, please see our cookies policy and the cookies section in this policy
- via our IT systems, eg:
 - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;

How and why we use your personal information

If you provide personal data to us, we will collect that information and use it for the purposes for which you have provided it and in accordance with this privacy policy.

Under data protection law, we can only use your personal data if we have a proper reason for doing so, eg:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
During the registration process on our website	For the performance of our contract with you or to take steps at your request before entering into a contract, Once you register you are no longer anonymous to XMA Limited
To fulfil orders, provide distribution and sales services and product delivery to you	For the performance of our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect our intellectual property and other commercially valuable information To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, ie to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or a those of a third party, ie for credit control and to ensure our customers are likely to be able to pay for our services

The above table does not apply to special category personal data, which we will only process with your explicit consent.

Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services or products.

We have a legitimate interest in processing your personal data for promotional purposes (see above 'How and why we use your personal information'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell OR share it with other organisations outside the subsidiaries of the XMA's holding company, Westcoast (Holdings) Limited for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us by emailing marketing@XMA.co.uk

Who we share your personal data with

We routinely share personal data with:

- other third parties where necessary to carry out your instructions, eg. Delivery Partners
- our group companies;
- credit reference agencies;
- our insurers and brokers;
- external auditors, eg in relation to the audit of our accounts;
- our banks;
- external service suppliers, representatives and agents that we use to make our business more efficient, eg marketing agencies

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Save as noted above, we will not share your personal data with any other third party.

Where your personal data is held

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see '**Who we share your personal data with**').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data out of the EEA**'.

How long will your personal data be kept for?

We will keep your personal data after we have finished our contractual arrangements you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.
- to reengage with you

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data. Further details on this are available and can be obtained by writing to data.protection@XMA.co.uk.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

We will share personal information with law enforcement or other authorities if required by applicable law.

Transfer of your information out of the EEA

We may have cause to transfer your personal information outside the European Economic Area (EEA) from time to time. However, should such transfer occur, we shall ensure that either the European Commission has made a positive finding of adequacy for transfer to such a country or that any transfer of your personal information will be subject to a European Commission approved contract (as permitted under Article 46(5) of the [General Data Protection Regulation](#) that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

If you would like further information please contact us at data.protection@XMA.co.uk (see 'How to contact us' below). We will not otherwise transfer your personal data outside of the EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

Cookies

A cookie is a piece of text that gets entered into the memory of your browser by a website, allowing the website to store information on your machine and later retrieve it. We use cookies to ensure that we give you the best experience on our website. The cookies used by our site are not used for targeted marketing, only for website statistics and automation which will improve your browsing experience. For more information on our usage of cookies please click [here](#).

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations

- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to our Privacy Compliance Officer (details below)
- let us have enough information to identify you (eg account number, user name, registration details),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them

If you would like to unsubscribe from any email newsletter you can also click on the 'unsubscribe' button at the bottom of the email newsletter.

It may take up to 20 working days for this to take place.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Please keep in mind that whenever you voluntarily disclose personal information online - for example on message boards, through email, or in chat areas - that information can be collected and used by others. In short, if you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

Ultimately, you are solely responsible for maintaining the secrecy of your passwords. Please be careful and responsible when you are online.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that this Privacy Policy can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was published on 17/05/2018 and last updated on 15/05/2018.

We may change this privacy notice from time to time. You should check this policy occasionally to ensure you are aware of the most recent version.

How to contact us

Please contact our Privacy Compliance Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Privacy Compliance Officer, Emily Garvey, please send an email to data.protection@XMA.co.uk, write to *XMA LTD*, Wilford Industrial Estate, Ruddington Lane, Wilford Nottingham NG11 7EP or call 0118 912 6000.

Do you need extra help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us at data.protection@XMA.co.uk