

## WyeDean Deli Confidential

### Privacy Policy

#### How we use your information

Read this to find out how and why we use the personal information you give us

May 2018

#### **How we use your information**

When you contact WyeDean Deli Confidential or associated businesses (Appendix A), we may ask you to give us some of your personal details so that we can answer and respond to your query. We also collect your personal details at other times, for example when you open an account with us or contact us via our websites.

We are committed to keeping all the information we hold about you secure, private and confidential. This leaflet explains why we need to collect your personal details and what we do with them. It also sets out the legal basis on which we collect and use your information and outlines the rights you have under current data protection legislation.

#### **Which of my details do you collect?**

We may ask for your full name (title, forename(s) and surname), date of birth, postal address, phone number, email address. We may also collect information on your nominated bank account details for example when you make a payment to us. When you're making a deposit by debit card, we'll need your card details. And when making a cheque deposit, we'll ask for details of the account on which the cheque is drawn. We need this personal information so that we can provide you with the accounts or services that you have asked for. We also need some of this information to meet our legal obligation to check your identity, address and source of funds. We may also need it for articles or features that include you. If you don't provide it, then we won't be able to provide you with our accounts or services.

#### **When do you collect these details?**

We'll collect them when you apply to open an account or contact us through our website, by phone or by completing a form and posting it to us. We'll also collect some of your details whenever you make a transaction or contact us about your accounts. This can be online, by phone, by post, by email or secure message, through social media.

#### **Using our website, emails, apps and social media**

Our websites, and the emails we send out, use cookies and other tracking technologies to collect information. When you visit our website, you can choose to decline cookies, but our online application forms and other processes need to use cookies to work properly. You can find out more about our cookie policy at [info@davidbroadbent.com](mailto:info@davidbroadbent.com)

When you use our website or apps, we collect information such as the browser you are using and the date, time and your IP address (a label used to identify your device on the internet). We may use social media, for example Twitter and Facebook, to communicate with you. We may also use posts on social media to find out how people view our products and services.

### **Providing details on behalf of someone else**

When you give us details about someone else, for example when you book a gift voucher, you must have their agreement to do so. Alternatively, you indemnify us for example in the case of a surprise gift.

Any questions? Tweet us @Davidf8

### **What do you do with my information?**

The main reasons we use your information are to open and administer your account(s), process your orders and deposits, and keep you up to date with information about your account(s). We may also use your information to:

- meet our legal obligation to check your identity, address and source of funds
- prevent or detect fraud or other crime
- develop, test and improve our products, systems and services
- invite you to take part in market research and surveys
- carry out anonymous statistical analysis (we won't be able to identify individuals when we do this)
- create customer-type profiles to help us improve existing products and services, and develop new ones
- send you marketing messages about our businesses which may be tailored to your circumstances (unless you have opted out)
- run competitions, events and promotional activities

When you call us, we may monitor or record your call for training or quality assurance. We also record calls so that we have a record of your consent in certain circumstances, for example when you agree to allow us to talk to a member of your family on your behalf.

### **Who do you share my details with?**

We use selected organisations to help us deliver the service we provide to you. We may share your personal information with:

- our service providers who provide data processing services to us, for example helping to administer your account and investments, printing and sending warrants and statements to you, and sending you emails about your accounts. We only share the information that's necessary for them to provide their services
- credit reference agencies to check your identity, address and source of funds, and to prevent fraud

We may also share your information with government bodies, law enforcement agencies, courts or other third parties to comply with our legal obligations or lawful disclosure requests.

You can also ask us to share your information with anyone else, for example a other people in our network.

### **How long do you keep my information for?**

We keep your personal information where we have an ongoing legitimate or lawful purpose.

We keep records for no longer than seven years unless you have an active account with us.

### **Do you send my information outside Europe?**

We may sometimes send your information outside Europe to process transactions or correspondence. These countries may have data protection laws that are different to those in Europe, which may be less protective. In these cases, we will ensure that your information is processed in line with data protection law in Europe.

### **Keeping each other informed**

We will give you information about your accounts and provide regular statements. If we need to get in touch, we will call you, write to you by email or letter, send you a text message, or contact you through our online service. In the event of a data breach that could lead to a high risk to your rights and freedoms, for example the risk of financial loss, we will let you know as soon as we reasonably can. To make sure you can receive information and communications from us, please make sure you tell us whenever you change your name, address, phone number, email address or nominated bank account. Giving us your most up to date details will also help protect your account(s) by making sure any information we send you doesn't fall into the wrong hands. You can update your details online or by contacting us.

### **How we use your information**

Any questions? Tweet us @Davidf8

### **The legal background and your rights**

Here we summarise the lawful basis on which we collect and use your information and outline the rights you have under current data protection legislation.

**Lawful basis** - We are allowed to use your personal information for a range of reasons, called 'lawful bases'. These are:

**Contract** - We need to collect and use your personal information to be able to provide you with the account(s) that you want to open and use. We cannot provide the service if you don't give us the information we ask for.

**Legal obligation** - We may need to use your personal information to meet our legal obligations, for example if we need to check your identity, address and source of funds to comply with the Money Laundering Regulations.

**Legitimate interests** - We have a legitimate interest in promoting our accounts and services. For this reason, we may use your personal details to, for example, send you marketing information about our own accounts or services that we think you may be interested in. We may also invite you to take part in research or surveys to help us improve the products and services that we offer. You can ask us to stop sending you marketing and/or research invitations at any time.

**Consent** - We only rely on consent as a lawful basis for using your personal information in a few limited circumstances, for example if you ask us to share your account information with an authorised third party who offers a; or if you want us to share information with your nominated representative. You can withdraw your consent at any time, and we make it as easy to withdraw consent as it is to give it.

**Public task** - There are times when we need to share information with other government bodies to allow them to meet their legal obligations, for example where HM Revenue & Customs.

### **Your rights**

You have a range of data protection rights in relation to the information we hold about you. You can exercise any of these rights by contacting us. Note that not all of the rights are absolute – some of them depend on which lawful basis we are using to process your information.

#### **Right of access**

You can ask us to provide you with a copy of the information we hold about you by making a 'Data Subject Access Request'. Contact us with all information asked for on the form.

#### **Right to data portability**

Where we process your personal information by automated means for contractual purposes, or with your consent, you can ask us to provide the information we hold about you in a structured, machine readable format (for example a CSV file).

#### **Right to rectification**

If the information we hold about you is incorrect, out of date or incomplete, please let us know and we will put it right.

#### **Right to restrict processing**

If you think the information we hold about you isn't accurate, you can ask us not to process it until we have corrected any errors or verified that the information is accurate.

#### **Right to erasure**

You can ask us to delete your personal information when:

- we no longer need it
  - you have given us consent and you later withdraw it
  - you have objected to us processing your information and we have no lawful basis to do so
  - we are legally obliged to delete it
- Right to object** Where we have a legitimate interest or a public interest in processing your personal information (see page 5), you can object to this.

#### **Right not to be subject to automated decision-making**

Some of our processes are partly or wholly automated, but we don't make decisions that have a significant or legal effect without human involvement. For example, we may check your evidence of identity electronically, but if this is unsuccessful we will write to you to ask for documentary evidence instead.

**Right to lodge a complaint with a supervisory authority** If you have a complaint about the way we have used your information, please contact us first and we will do our best to put things right for you. If you're not happy with our response, you can escalate your complaint to the Information Commissioner's Office (ICO) – see below for their contact details.

Any questions? Tweet us @Davidf8

### **Changes to how we use your information**

From time to time we may update this privacy notice. You can see the latest version at [www.davidbroadbent.com](http://www.davidbroadbent.com) or call us and we can send you a copy. If we make a significant change to how we use your information, we will let you know in advance.

### **Data protection questions or concerns?**

David Broadbent is the data controller of the information we hold about you. If you have any questions or concerns about how we process your information, you can contact us using the details on the next page, or write to: Data Protection Officer David Broadbent Photography, Rose Cottage, Bream Road, Whitepool, St Briavels, Gloucestershire. GL15 6TL

### **Want to find out more?**

You can find out more about data protection and the rights you have by contacting the independent Information Commissioner's Office: [ico.org.uk](http://ico.org.uk) Wycliffe House Water Lane Wilmslow SK9 5AF 0303 123 1113 7 You can call us any time. We're here in the UK all day, every day. Calls from the UK are free. We may record your call to help us give you the best service. Write to us at the above

Always here to help you

Alternative versions of this brochure Ask us for a version:

Any questions? Tweet us @Davidf8

### *Appendix A*

David Broadbent Photography

WyeDean Deli Confidential

Forest of Dean & Wye Valley School of Photography

Steampunk Confidential