

Bluemay Limited and Bluemay Weston Limited

General Data Protection Regulation (“GDPR”) Transparency Notice

About this Notice

This GDPR Transparency Notice describes how Bluemay Limited ("BL") and Bluemay Weston Limited ("BWL") ('we') collect and use your personal information during and after your relationship with us. Each of BL and BWL is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you and explaining it clearly to you. This Notice applies to prospective, existing and former customers of BL and BWL (including employees and representatives of our corporate customers); individual and business contacts and prospects; individuals who request information from us; any person who supplies products or services to BL or BWL, either as an individual or as the employee or representative of a supplier, and third parties acting for our customers. It is important that you read this Notice, together with any other privacy information or notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. We reserve the right to update this GDPR Transparency Notice at any time, and we will publish a new GDPR Transparency Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

The Directors of BL and BWL have responsibility for BL and BWL compliance with data protection law. If you have any questions about this GDPR Transparency Notice or how we handle your personal information, please contact the Directors on 01380 821821 or by email to gdpr@bluemay.co.uk or to gdpr@bluemayweston.co.uk. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the course of our dealings with you.

Information we hold

Personal data, or personal information, means any information about an individual from which that person can be identified. We collect different information depending on your relationship with us.

Individual Customers

We process:

- your name, title, address, contact details and VAT registration information. Such processing is necessary for the provision of goods and or services by us to you.
- your bank details. Such processing is necessary on the rare occasions we are required to pay a refund to you (for example where you have made an overpayment on your account).
- your marketing preferences. Such processing is necessary for the legitimate interest of promoting and growing our business (provided that your interests and fundamental rights do not override our interests).
- feedback you provide to us on our products and services. Such processing is necessary for the legitimate interest of managing our business and improving our services and products (provided that your interests and fundamental rights do not override our interests).

We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Individual prospects and other non-customer contacts

We process your name, address and contact details, your marketing preferences and feedback you provide on events or marketing campaigns. Such processing is necessary for the legitimate interest of promoting and growing our business and improving our services (provided that your interests and fundamental rights do not override our interests).

We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Individual suppliers

We process:

- your name, title, business contact information including addresses, telephone numbers and email addresses and VAT registration details. Such processing is necessary for performance of any contract between us.

- details relating to the performance of the contract between us, including quality system accreditations, financial information and bank details for payment. Such processing is necessary for performance of the contract between us.

We may perform due diligence in the form of credit checks. We do this as necessary for our legitimate interests (provided that your interests and fundamental rights do not override our interests).

We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Corporate customers, suppliers and third party business contacts and prospects

We process names, titles and business contact information including addresses, telephone numbers and email addresses for your employees and representatives and corporate bank details and VAT registration details. Such processing is necessary for performance of any contract between us.

We may perform due diligence in the form of credit checks and verification of the company registration details. We do this as necessary for our legitimate interests (provided that the interests and fundamental rights of the individual do not override our interests).

We process your marketing preferences. Such processing is necessary for the legitimate interest of promoting and growing our business (provided that the interests and fundamental rights of any individual employees and representatives do not override our interests).

We process any feedback you, your employees or your representatives may provide to us on our products and services. Such processing is necessary for the legitimate

interest of managing our business and improving our products and services (provided that the interests and fundamental rights of any individual employees and representatives do not override our interests).

How we collect information about you

We collect personal information direct from you when we establish you as a customer of the firm, when you complete our website enquiries form, if you register with us to receive updates and information from us, or where we enter into a contract to receive services from you. We collect further information from you during the period of our business relationship or for the duration of you providing services to us. We may collect information from credit reference agencies or other background check agencies and from public sources such as Companies House, from an online search or from social media sites.

Our lawful basis for gathering and using personal information

We will only use your personal information when the law allows us to for our legitimate interests and your interests and fundamental rights do not override those interests. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

We share personal data between BL and BWL as necessary to ensure the smooth running of our business and to improve the service we provide to customers. With your consent we may share your information if we refer you to a third party adviser for specialist advice, such as a raw material supplier or toolmaker.

The following activities are carried out by third-party service providers on our behalf: IT support and maintenance; hosting our website (including analytics).

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

Transferring information outside the European Economic Area (“EEA”)

Our electronic personal information is hosted primarily on servers located within the EEA with some data stored on or backed up to secure cloud servers in the United States of America. If we are required to transfer information outside the EEA, we only do so where permitted by law, and where we have put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection. If you are based outside the EEA we may transfer personal information to the correspondence address you provide to us. We will take all reasonable steps to ensure that such transfers are secure. By engaging with us from outside the EEA you acknowledge and agree that such transfers are necessary for us to provide services to you.

Data Security

We have put in place appropriate measures to protect the security of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will process your personal information only on our instructions and they are subject to a duty of confidentiality. We also have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long we keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the

personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. Where a minimum retention period is required by law (such as retaining records for HMRC purposes) we comply with that minimum period plus up to 12 months to allow time for us to anonymise or delete information in accordance with our internal data management processes. Please contact gdpr@bluemay.co.uk or gdpr@bluemayweston.co.uk if you would like to discuss specific retention periods applicable to your matters. If we are required to retain your information longer than our standard retention periods, we will let you know (unless we are prevented by law from doing so.) In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information

about you, for example if you want us to establish its accuracy or the reason for processing it.

- Request the transfer of your personal information to another party.
- Withdraw consent. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to continue to process your information in accordance with another lawful basis which has been notified to you.

To exercise any of the above rights, please contact BL or BWL on 01380 821821 or by email to gdpr@bluemay.co.uk or gdpr@bluemayweston.co.uk. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may refuse to comply if your request for access is clearly unfounded or excessive. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

In addition to the above you may lodge a complaint with the appropriate supervisory body for data protection.