

Privacy Policy for Primary Network Products (UK) Limited (company registration number: 5529842)

Date of Issue: 1st March 2018

We are committed to protecting and respecting your privacy.

This Privacy Policy, together with our Terms and Conditions and Cookie Policy, sets out the basis on which any personal information that **Primary Network Products (UK) Limited** (registered in England and Wales with company number 5529842 of 27 Old Gloucester Street, London, WC1N 3AX, UK (“we”, “our”, “us”) collects from you (“your”, and “you” refer to you and any person for whom a registered account has been created by you, or who uses the Website on your behalf), or that you provide to us, will be processed by us and how we will treat it.

Primary Network Products (UK) Limited is a business to business supplier and does not sell or market products to the general public.

By using our Website (as defined below) you agree to the terms of this Privacy Policy. If you do not agree with these terms you should not use our Website or provide us with any of your information.

For the purposes of **Data Protection Legislation** (meaning: (i) unless and until it is no longer applicable in the UK, the Data Protection Act 1998; (ii) unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (iii) any successor legislation to the GDPR or the Data Protection Act 1998), **Primary Network Products (UK) Limited** is the data controller of your personal information.

Information that we may collect from you

We may collect and process the following personal information about you for or in relation to the **Primary Network Products (UK) Limited** website – www.primarynetworks.co.uk (the “Website”). References in this Privacy Policy to the Website mean together, the Website, all related content, media and underlying software and technology, including any future updates to it:

- information that you provide when completing e-commerce transactions;
- information for the purposes of delivering your ordered products;
- if you contact us, we may keep a record of that correspondence;
- if you provide a review on a social media channel (e.g. facebook, Instagram, snapchat, reviews.co.uk) these may appear on the **Primary Network Products (UK) Limited** website;
- details of your visits to the Website including, but not limited to, traffic data, location data, weblogs interaction data and other communication data, the pages you access;
- information provided by you when you participate in any forum, discussion board or other social media function on the Website;
- technical information including: your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and
- storing your username and password as a cookie, to the extent you give us permission to do so.

Use of personal information

To the extent that the processing of your personal information is necessary in order for us to provide you with a service you have requested under a contract we have with you, we rely on that contract as the legal basis on which we process your personal information.

Otherwise, we rely on your consent as the legal basis on which we process your personal information. We will seek your consent when you register for the Website and we may seek further consents from you from time to time on the Website or by contacting you in other ways, including by email.

We process personal information about you in relation to our Website for the following purposes and in the following ways:

- tailoring our service to your requirements and preferences;
- aggregating and anonymising (i.e. removing all identifiers which could otherwise be used to identify you) certain information about you and your use of the Website with that of other users and sharing this with carefully selected third parties. We may not limit such third parties' use of such aggregated information except that we do require them to agree not to seek to make such data personally identifiable;
- using aggregated and anonymised information about you and your use of the Website to improve the Website;
- analysing information about you to subsequently use for marketing;
- communicating with you with information you have provided to us about your account, orders, our terms and conditions, this Privacy Policy, services and products, and other communications with you;
- processing e-commerce transactions, and
- delivering your products to you with information you have provided to us in your order.

In addition, if we or our owners undergo or propose to undergo a business transition, such as a corporate reorganisation, sale, merger or acquisition by somebody else of some or all of our shares or assets, we may share your personal information with parties connected with the proposed transaction as part of the process of those parties investigating our business and transferred to the new party taking over the business and our Website. Any information which is transferred or shared in this way will remain subject to the promises given to you in the version of this Privacy Policy which applies at the relevant time, unless you agree to different terms.

Withdrawal of consent

You can withdraw your consent to any use we make of your personal information by contacting us in the manner which is set out at the end of this Privacy Policy. However, you cannot withdraw your consent for processing which is necessary in order for us to provide a service you have requested under a contract we have with you, unless you also ask us to stop providing that service and end the contract with us.

Retention of Personal Data

Personal Data (for both non-account customers and account customers) will be retained by us for a maximum period of 24 months. Following this time, the Personal Data will be deleted.

Marketing

We will inform you (before collecting your information) if we intend to use your information for marketing purposes.

You can exercise your right to prevent such processing by selecting the appropriate opt in/opt out button each time you submit a form containing your contact information on the Website. You can also exercise the right any time by contacting us in the manner set out at the end of this Privacy Policy.

Where and how we store your personal information

The information we collect from you is held on servers physically located within the UK or the European Economic Area (“**EEA**”).

We will use appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage of your personal information.

Whilst we will take every reasonable step to protect the files provided by users for the purposes of printing, we provide no guarantee to users that their files cannot become lost or corrupted. We recommend that users take adequate precaution to save these files.

Password

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Disclosure of your personal information

We will not sell your personal information in a personally identifiable format to third parties without your prior consent.

We may share your personal information with selected third parties, including:

- Worldpay and Paypal (for the purposes of completing e-commerce transactions);
- DPD (or any other delivery company we contract with from time to time) to deliver your products;
- prospective and actual successors in title to our business;
- suppliers and external agencies we engage to process information on our behalf;
- certain third parties who provide technical support for the operation of our site (our Web hosting service for example) may access such information;
- business partners and sub-contractors for the performance of any contract we enter into with them or you – for the purposes of processing your information on our behalf;
- analytics (such as Google analytics) and search engine providers that assist us in the improvement and optimisation of our Website, and
- to the extent that disclosure is required by law or any regulatory authority.

Personal information of minors

Our Website is not directed to minors and we do not knowingly collect any personal information from children under 13 years of age through the Website. If you are the parent or guardian of a child under the age of 13 from whom you think we have collected personal information, please contact us in the manner set out at the end of this Privacy Policy. If we become aware that a child under 13 has provided us with personal information about themselves without our having received the consent of their parent or guardian, we will take reasonable steps to remove the information from our Website and terminate the child’s account.

Cancellation of account

If your account is cancelled, by you or by us, this will result in the permanent deletion of your account from our Website. It will typically take up to one month to delete an account, however, we will inform you if this is likely to take longer. We will not retain any other data about you for any other purpose after deletion of your account.

We delete accounts of customers which are inactive for 13 months or longer.

Internet

Given that the internet is a global environment, using the internet to collect and process personal information necessarily involves the transmission of information on an international basis. Therefore, by browsing the Website and communicating electronically with us, you acknowledge and agree to our processing of personal information in this way.

The transmission of information via the internet is not completely secure. Although we do our best to protect personal information, we cannot guarantee the security of your information transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access or processing.

Our Website may, from time to time, contain links to other websites or applications which are outside of our control and are not covered by this Privacy Policy. We do not accept any responsibility or liability for other website's or application's privacy policies. If you access other websites or applications using the links provided, please check their policies before submitting any personal information.

Cookies

We use cookies to help improve the Website in a variety of different ways. Please check our Cookie Policy for details of the cookies that we are currently using on the Website and for details on how to manage them.

Changes to this Policy

We will post any material changes that we may make with our Privacy Policy in the future on the Website. Where appropriate, we will notify you of the change by email. This will ensure that you are always aware of the information we collect, how we use it and the circumstances under which we may disclose it.

Access to information

Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with Data Protection Legislation. We will respond to any valid access request within 30 days and will make available your information to you in a commonly used electronic format, unless you request the information in a different format. To obtain a copy of the information we hold about you please contact us in the manner set out at the end of this Privacy Policy.

However, where a request is excessive, onerous or repetitive, it may take us longer than 30 days to process this request and we may charge you a reasonable fee. Where this is the case we will inform you.

Erasure or rectification of information

Data Protection Legislation gives you the right to ask us to erase information held about you if it is no longer necessary in relation to the purposes for which it was collected or processed. You also have

the right to ask us to rectify inaccurate information we hold about you or to complete incomplete information about you. Your right of erasure and/or rectification can be exercised in accordance with Data Protection Legislation. If you make a valid erasure or rectification request we will take reasonable steps to erase or rectify your information so far as required by Data Protection Legislation. However, Data Protection Legislation allows us to retain and continue processing your information in certain circumstances and if any of those circumstances apply we may continue to hold and process your information (in accordance with this Privacy Policy) despite your request for us to erase it. Such circumstances include (but may not be limited to) where our continued holding and/or processing of your information is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation that requires processing of personal data by EU or member state law to which the controller is subject, or for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in so far as the erasure of the information would be likely to render impossible or seriously impair the achievement of the objectives of the archiving purposes in the public interest, or the scientific and historical research purposes or the statistical purposes, and
- for the establishment, exercise or defence of legal claims.

Right to complain

If you consider that we have failed to comply with this Privacy Policy and/or Data Protection Legislation in relation to information about you which we hold or process, you have a right to make a complaint to the relevant supervisory authority, which in the UK is the Information Commissioner's Office: <https://ico.org.uk/>.

Contact

If you have any requests or queries concerning your personal information or any queries with regard to our practices, please send us an email on enquiries@primarynetworks.co.uk or write to us at the following address:

Primary Network Products (UK) Limited,
27 Old Gloucester Street,
London,
WC1N 3AX,
UK