

**SCOPE**

1. This Privacy Policy applies to data controlled by Gusto Group Ltd, on its own behalf, and on behalf of sister-companies that use the services of Gusto Group Ltd for the purposes of controlling and safeguarding personal data.

**Business-to-Business Data**

2. B2B data, in relation to people, comprises the names and contact details provided on, for example, business cards, business correspondence, invoices and websites etc; this information is open to the general public and is provided with the intention that it be used openly for commercial purposes. This type of public information is not therefore safeguarded by this Privacy Policy.

**Personal Data**

3. Personal data comprises that data which is provided by individuals in their private capacities as employees, as consumers, or incidentally to their B2B activities (by providing non business related information on a B2B e-mail for example). This information is not intended for public dissemination, and is therefore the subject of this Privacy Policy.

**OVERVIEW**

4. Maintaining the security of your data is our priority, and we are committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. We are also dedicated to being transparent about what data we collect about you and how we use it.
5. This policy, which applies to any personal data we acquire from you, provides you with information about:
  - o how we use your data;
  - o what personal data we collect;
  - o how we ensure your privacy is maintained; and
  - o your legal rights relating to your personal data.

**HOW WE USE YOUR DATA**

**General**

6. We, and trusted partners covered by this policy, use your personal data:
  - o to provide goods and services to you;
  - o to make a tailored website available to you;
  - o to manage any registered account(s) that you hold with us;
  - o to verify your identity;
  - o for crime and fraud prevention, detection and related purposes;
  - o with your agreement, to contact you electronically about promotional offers and products and services which we think may interest you;
  - o for market research purposes - to better understand your needs;
  - o to enable us to manage customer service interactions with you; and
  - o where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

### **Promotional communications**

7. We use your personal data for electronic marketing purposes (with your consent) and may send you postal mail to update you on the latest offers.
8. We aim to update you about products & services which are of interest and relevance to you as an individual.
9. You have the right to opt out of receiving promotional communications at any time, by contacting us via the contact channels set out in this Policy below.

### **Our service providers and suppliers**

10. In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include IT, delivery and marketing service providers.
11. We only allow our service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to us and to you, and for no other purposes.

### **Other third parties**

12. Aside from our service providers, we will not disclose your personal data to any third party, except as set out below. We will never sell or rent our customer data to other organisations for marketing purposes.
13. We may share your data with:
  - our carefully selected partners who provide our branded products and services, if we have your consent to do so;
  - credit reference agencies where necessary for card payments;
  - governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so: -
    - to comply with our legal obligations;
    - to exercise our legal rights (for example in court cases);
    - for the prevention, detection, investigation of crime or prosecution of offenders; and
    - for the protection of our employees and customers.

### **International transfers**

14. To deliver products and services to you, it is sometimes necessary for us to share your data outside of the European Economic Area. This will typically occur when service providers are located outside the EEA or if you are based outside the EEA. These transfers are subject to special rules under data protection laws.
15. If this happens, we will ensure that the transfer will be compliant with data protection law and all personal data will be secure. Our standard practice is to use 'standard data protection clauses' which have been approved by the European Commission for such transfers. Those clauses can be accessed [here](#).

## **How long do we keep your data?**

16. We will not retain your data for longer than necessary for the purposes set out in this Policy.
17. Different retention periods apply for different types of data, however the longest we will normally hold any personal data is 6 years

## **WHAT PERSONAL DATA MIGHT WE COLLECT?**

18. We may collect the following information about you:
  - your name, age/date of birth and gender;
  - your contact details: postal address including billing and delivery addresses, telephone numbers (including mobile numbers) and e-mail address;
  - purchases and orders made by you;
  - your on-line browsing activities on our websites;
  - any password(s) we allocate to you;
  - when you make a purchase or place an order with us, your payment card details;
  - your communication and marketing preferences;
  - your interests, preferences, feedback and survey responses;
  - your location;
  - your correspondence and communications with us; and
  - other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed or public Facebook page)
19. Our websites are not intended for children and we do not knowingly collect data relating to children.
20. The above list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you set up an on-line account on our websites, or send an email to our customer services team.
21. Other personal data is collected indirectly, for example your browsing or shopping activity. We may also collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources.

## **HOW WE PROTECT YOUR DATA**

### **Our controls**

22. We are committed to keeping your personal data safe and secure. Our security measures include:
  - encryption of data;
  - security controls which protect our IT infrastructure from external attack and unauthorised access; and
  - internal policies setting out our data security approach and training for employees

## **WHAT YOU CAN DO TO HELP PROTECT YOUR DATA**

23. We will never ask you to confirm any bank account or credit card details via email. If you receive an email claiming to be from us asking you to do so, please ignore it and do not respond.
24. If you are using a computing device in a public location, we recommend that you always log out and close the website browser when you complete an online session.

25. In addition, we recommend that you take the following security measures to enhance your online safety both in relation to us and more generally:

- keep your account passwords private. Remember, anybody who knows your password may access your account.
- when creating a password, use at least 8 characters. A combination of letters and numbers is best. Do not use dictionary words, your name, email address, or other personal data that can be easily obtained. We also recommend that you frequently change your password.
- avoid using the same password for multiple online accounts

## **YOUR RIGHTS**

26. You have the following rights:

- the right to ask what personal data that we hold about you at any time, subject to a fee specified by law (currently £10);
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge; and
- (as set out above) the right to opt out of any marketing communications that we may send you.

27. If you wish to exercise any of the above rights, please contact us using the contact details set out below

### **General**

28. We collect and use customers' personal data because it is necessary for:

- the pursuit of our legitimate interests (as set out below);
- the purposes of complying with our duties and exercising our rights under a contract for the sale of goods to a customer; or
- complying with our legal obligations.

29. In general, we only rely on consent as a legal basis for processing in relation to sending direct marketing communications to customers via email or text message.

30. Customers **have the right to withdraw consent at any time**. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn.

### **Our legitimate interests**

31. The normal legal basis for processing customer data, is that it is necessary for our legitimate interests, including:

- selling and supplying goods and services to our customers;
- protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our products and services;
- sending promotional communications which are relevant and tailored to individual customers;
- understanding our customers' behaviour, activities, preferences, and needs;
- improving existing products and services and developing new products and services;
- complying with our legal and regulatory obligations;
- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- handling customer contacts, queries, complaints or disputes;

- managing insurance claims by customers;
- protecting ourselves, and employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to ourselves;
- effectively handling any legal claims or regulatory enforcement actions taken against us; and
- fulfilling our duties to our customers, colleagues, shareholders and other stakeholders

### **What are cookies?**

32. Like most websites, our websites use cookies to collect information. Cookies are small data files which are placed on your computer or other devices (such as smart 'phones or 'tablets') as you browse this website.
33. They are used to 'remember' when your computer or device accesses our websites. Cookies are essential for the effective operation of our websites and to help you deal with us online. They are also used to tailor the products and services offered and advertised to you, both on our websites and elsewhere.

### **Information collected**

34. Some cookies collect information about browsing and purchasing behaviour when you access this website via the same computer or device. This includes information about pages viewed, products purchased and your journey around a website.
35. We do not use cookies to collect or record information on your name, address or other contact details. We can use cookies to monitor your browsing and purchasing behaviour.

### **How are cookies managed?**

36. The cookies stored on your computer or other device when you access our websites are designed by us, or on our behalf, and are necessary to enable you to a make use of our websites.

### **What are cookies used for?**

37. The main purposes for which cookies are used are:
- For technical purposes essential to effective operation of our websites, particularly in relation to on-line transactions and site navigation.
  - For us to market to you, particularly web banner advertisements and targeted updates.
  - To enable us to collect information about your browsing and shopping patterns, including to monitor the success of campaigns, competitions etc.
  - To enable us to meet our contractual obligations to third parties

### **How do I disable cookies?**

38. If you want to disable cookies you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

#### **For Microsoft Internet Explorer:**

1. Choose the menu "tools" then "Internet Options"
2. Click on the "privacy" tab
3. Select the setting the appropriate setting

#### **For Google Chrome:**

1. Choose Settings> Advanced

2. Under "Privacy and security," click "Content settings".
3. Click "Cookies"

**For Safari:**

1. Choose Preferences > Privacy
2. Click on "Remove all Website Data"

**For Mozilla firefox:**

1. Choose the menu "tools" then "Options"
2. Click on the icon "privacy"
3. Find the menu "cookie" and select the relevant options

**For Opera 6.0 and further:**

1. Choose the menu Files"> "Preferences"
2. Privacy

**What happens if I disable cookies?**

39. This depends on which cookies you disable, but in general the website may not operate properly if cookies are switched off. If you only disable third party cookies, you will not be prevented from making purchases on our sites. If you disable all cookies, you will be unable to complete a purchase on our sites

**CONTACT INFORMATION**

40. If you have any questions about how we use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- phone us on: 01636-894900;
- e-mail us at: [mail@gusto-uk.com](mailto:mail@gusto-uk.com) or
- write to us at: Gusto Group Ltd, Millennium Green Business Centre, Rio Drive, Collingham, Newark, Nottinghamshire NG23 7NB

41. You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <https://ico.org.uk>.

**UPDATES**

42. This policy was last updated in March 2018