

## Privacy Policy

This Privacy Policy applies to the personal data we obtain through the Peter Brotherhood Ltd websites, mobile applications, and social media pages, and offline collection in connection with sales, marketing, partner and supplier engagement, and third party sources including ad networks, agents, representatives and brokers.

This Privacy Policy sets out what personal data Peter Brotherhood Ltd collects about you and how we use and protect it. Peter Brotherhood Ltd is committed to conducting business in compliance with applicable laws and ensuring that your privacy is protected and that personal data is held securely.

We are required by data protection law to give you the information in this Privacy Policy. It is important that you read the Privacy Policy carefully, together with any other similar or additional information that we might give you from time to time about how we collect and use your personal data.

This Privacy Policy applies from 25 May 2018, when the General Data Protection Regulation comes into force. It does not give you any contractual rights. We may update this Privacy Notice at any time.

### Who is the data controller?

Peter Brotherhood Ltd at 85 Papyrus Road, Peterborough, Cambridgeshire, PE4 5HG is the “controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

### What type of personal data do we collect about you?

We may collect the following personal data:

- Name and job title
- Contact information including email address
- Information used to create your online account
- Biographical and demographic information
- Purchase and customer service history
- Financial information
- Location data
- Information relevant to customer surveys and/or offers
- Other information provided to us by you

### We hold and use this personal data so that we can:

- conduct marketing and sales activities
- respond to your enquiry or request
- prepare, negotiate and perform a contract with you
- process your order or provide you with specific information
- provide and administer our products and services
- provide customer and technical support
- support our customer/supplier relationship with you

- better understand your business needs
- maintain our internal record keeping to effectively manage your account
- use the information to improve our products and services
- periodically send you promotional emails about new products and services
- contact you for market research and data analytic purposes
- make informed business decisions
- conduct investigations and comply with and enforce legal obligations
- establish or preserve a legal claim or defence if required
- verify your identity to prevent fraud or other illegal activities

## What are our legal grounds for using your personal data?

Data protection law specifies the legal grounds on which we can hold and use personal data. We rely on one or more of the following legal grounds when we process your personal data:

- Your consent (**consent**)
- We need it to take steps to enter into a contract with you (**entry into a contract**)
- We need it to comply with a legal obligation (**legal obligation**)
- It is necessary for our legitimate business interests (**legitimate interest**)

## Security

We are committed to ensuring that your personal data is secure. In order to prevent against unlawful loss or alternation, and against unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard the personal data we collect.

## Children

Peter Brotherhood Ltd will not knowingly collect personal data from children without insisting that they seek parental consent if required by applicable law. We will only use or disclose personal data about a child to the extent permitted by law, to seek parental consent pursuant to local law and regulations, or to protect a child.

## Who do we share your personal data with?

We do not disclose, sell or otherwise market your personal data to third parties except as described here or at the time of collection:

- We may share any of your personal data with our Group Company, Avingtrans Plc in accordance with our legitimate business interests
- We may share any of your personal data with our legal and other professional advisers, including our banks and other financial institutions
- We may share any of your personal data with suppliers and service providers we have retained to perform services on our behalf
- We may share any of your personal data with our marketing partners, customers and other business partners for the purposes described in this policy
- We may share any of your personal data as required by law, to governmental or

judicial or law enforcement authorities, including the HMRC

## **Transferring personal data outside the European Economic Area (“EEA”)**

An overseas transfer of personal data takes place when the data is transmitted or sent to, viewed, accessed or otherwise used in, a different country. Data protection law restricts transfers of personal data to countries outside of the EEA because the law in those countries might not provide the same level of protection to personal data as the law in the EEA. To ensure that the level of protection afforded to personal data is not compromised, therefore, we are only able to transfer your personal data outside the EEA if certain conditions are met, as explained below.

To ensure that data protection is not compromised when personal data is transferred to another country, Peter Brotherhood Ltd assesses the risks of any transfer of personal data outside of the UK (taking into account the principles in this Policy, as well as the restrictions on transfers outside the EEA) and puts in place additional appropriate safeguards where required.

We may transfer some of your personal data to any country outside the EEA that Peter Brotherhood Ltd operates in.

If there is an adequacy decision in place for the relevant non EEA country, the country will be deemed to provide an adequate level of protection for your personal data. Where there is no adequacy decision in place for the relevant non EEA country, we will put in place appropriate measures to ensure that any personal data transferred to the country is treated in a way that is consistent with and which respects the EEA and UK laws on data protection and receives an adequate level of protection with that country.

## **How long will we keep your personal data?**

To the extent permitted by applicable law, we will retain personal data we obtain about you as long as (a) it is needed for the purposes for which we obtained it, in accordance with the provision of this Privacy Policy, or (b) we have another lawful basis, as stated in this Privacy Policy or at the point of collection, for retaining that personal data beyond the period for which it is necessary to serve the original purpose for obtaining the personal data.

## **Your choices**

You have a number of legal rights relating to your personal data. You have the right to:

- access certain personal information we maintain about you;
- request that we update, correct, amend, delete, remove, restrict the processing of your personal information; or
- exercise your right to data portability.

Where provided by law, you may withdraw consent you previously provided to us or object at any time to the processing of your personal information on legitimate grounds relating to your particular situation.

To request to exercise these rights please contact Greg Harding, General Manager at Peter Brotherhood Ltd in writing. Please note that these rights are not absolute and in some circumstances we may be entitled to refuse some or all of your request.

If you have any questions or concerns about how your personal data is being used by us, you can contact Greg Harding, General Manager at Peter Brotherhood Ltd, 85 Papyrus Road, Peterborough, Cambridgeshire, PE4 5HG.

Note too that you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>