

## Privacy Notice

Westbury Park Engineering Ltd respects your privacy and is committed to protecting your personal data. This Privacy Notice will tell you about how we look after your personal data when you deal with us or when you visit our website and tells you about your privacy rights and how the law protects you.

### 1. Your Personal Data – What is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016 (the GDPR).

We may collect, use and store and transfer different kinds of personal data:

- **Identity Data** – includes first name, last name, title (which may indicate marital status and gender) and CCTV images of you
- **Contact Data** – includes billing address and delivery address (either which may be, in certain circumstances also your personal address) email address and telephone numbers
- **Financial Data** – includes personal bank account details
- **Transaction Data** – includes details about to and from you and other details of the products and services you have purchased from or supplied us (in your individual capacity)
- **Technical Data** – includes internet protocol IP addresses, time zone setting and location, browser plug-in type and versions, operating system and platform and other technology devices you use to access our website
- **Usage Data** – includes information about how you use our website, products and services (in your individual capacity)
- **Marketing and Communications Data** – includes your preferences in receiving marketing from us and your communication preferences.

We do not knowingly collect data relating to children or specialised categories of personal data.

### 2. Who we Are

Westbury Park Engineering Ltd, referred to as “we”, “us”, or “our” in this Privacy Notice, is the Data Controller. If you have any question in relation to this Privacy Notice, including any requests to exercise your legal rights, our contact details are:-

Data Protection Officer  
Westbury Park Engineering Ltd  
Brook Lane  
Westbury  
Wiltshire  
BA13 4ES

Email: [office@westburyparkengineering.co.uk](mailto:office@westburyparkengineering.co.uk)

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issued ([www.ico.org.uk](http://www.ico.org.uk)).

### 3. How is your personal data collected

We use different methods to collect data from and about you, including:-

**Direct interaction** – you may give us your personal information by filling in forms or corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:-

- Apply for or enquire about our products or services;
- Enquire about providing goods or service to us;

- Request marketing information be sent to you;
- Visit our premises;
- Give us your business card;
- Enter a completion, promotion or survey; or
- Give us some feedback

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. This is personal data is collected by using cookies, server logs and other similar technologies. In addition when you visit our premises, images may be captured by our CCTV.

**Third parties or publically available sources.** We may receive personal data about you from various their parties and public sources:-

- Analytics providers, such as Google, based outside of the EU;
- Search information providers based inside or outside of the EU;
- Identity and Contact Data from publically available sources such as Companies House, social media site based inside or outside of the EU.

#### 4. How we use your personal data

We only use your personal data when the law allows us to. The table below describes all the ways we plan to use your personal data and the legal basis we rely on to do so. Please note we may have to process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of Personal Data	Lawful basis for processing, including basis of legitimate interest
To liaise with you/your organisation about a potential contract with you as a customer	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To register you/your organisation as a new customer	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To process and deliver your order including: a) Manage payment fees and charges b) Collect and recover money owed to us	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> <li>• Marketing and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
To manage our relationship with you including: a) Notifying you about changes to our terms or privacy policy or other contract terms b) Asking you to make a review or undertake a survey	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Marketing and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with legal obligation</li> </ul>
To administer and protect our business and our website (including troubleshooting, data analysis, system maintenance and support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)</li> <li>• Necessary to comply with legal obligation</li> </ul>

Purpose/Activity	Type of Personal Data	Lawful basis for processing, including basis of legitimate interest
To deliver relevant website content and measure/understand the effectiveness of the advertising we use	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Usage Data</li> <li>• Marketing and Communications Data</li> <li>• Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interest (to study how customers use our products and services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>
To use data analytics to improve our website, products and services, marketing and customer relationships	<ul style="list-style-type: none"> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
To register you/your organisation as a new or potential supplier	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To deal with you/your organisation in the capacity as a supplier	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Transaction Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to help ensure that we have the best possible supply chain)</li> </ul>
To manage your visit to our site	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with legal obligation</li> <li>• Necessary for our legitimate interests (to help manage the logistics of your visit)</li> </ul>

## 5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other employees of Westbury Park Engineering in order to carry out legitimate business interests. We will only share your data with third parties with your consent.

## 6. Data Security

We have put in place appropriate security/technical measures to prevent your personal data from loss, misuse, unauthorised access, disclosure or alteration. We will notify you and any applicable regulator of a breach when we are legally required to do so.

## 7. Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes we collected for, including for the purposes of satisfying any legal, accounting or reporting requirements.

We determine the appropriate retention period for personal data based on the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure and the purpose for which the data was obtained.

## 8. Your legal rights

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- To request a copy of your personal data which we hold about you
- To request that we correct any personal data about your if it is found to be inaccurate or out of data
- To request your personal data is erased where it is no longer necessary for us to retain such data

- To withdraw your consent to processing at any time
- Where there is a dispute in relation to the accuracy of processing of your personal data, to request a restriction is place on further processing
- To lodge a complaint with the Information Commissioners Office

You will not have to pay a fee to access your personal data (or exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively we may refuse to comply with your request in these circumstances.

We will try to responds to all legitimate requests within one month, however if you make multiple request or particularly complex requests it may take longer. In this case, we will notify you and keep you updated.

## 9. Further Processing

Our website may contain links to other third party websites. These websites are not covered by our Privacy Notice and we are not responsible for the privacy practices of any of these other websites. If you leave our website we encourage you to read the privacy statement of other websites.

If our privacy statement changes in any way, we will place an updated version on this webpage. If you do not agree with the changes do not continue to use the website. Where and whenever necessary, we will seek your prior consent to any new form of purpose and processing conditions.

## 10. Glossary

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Legitimate interest** means the interest of our business in conducting and managing our business to give our customers and potential customers the best product/service and the most secure experience. We consider the balance any potential impact on your (both positive and negative) and your rights before we process your personal details for legitimate interests. We do not use your personal data for activities where are interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).