

The White Sea and Baltic Company Limited

Privacy Notice

April 2018

The White Sea and Baltic Company Limited ("WSB") (company number 3649118), holds and processes personal data about customers and suppliers in order to run its business. In doing so, we comply with relevant data protection legislation.

This Privacy Notice has been issued by WSB to comply with the General Data Protection Regulation (GDPR), which comes into effect on 25 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1988 with effect from 25 May 2018.

Data controllers

As a data controller, WSB ("we") collects and processes personal data in relation to customers and suppliers for the following purposes:

1. Customers

- a) For marketing purposes, we collect contact personal details including, but not limited to names, telephone numbers (including mobile numbers), place of work, and email addresses.
- b) We maintain files with historic information of individual customer requirements, of rates quoted for both general and specific goods and services offered, and of customers' products which are or may have been the subject of the various services which we provide.

2. Suppliers

- a) We maintain personal details of contacts at suppliers, including email addresses, telephone and mobile numbers
- b) We maintain a database of the services and products offered by individual suppliers and of prices which may have been quoted, both historically and currently
- c) For the purpose of making payments, we may maintain details of suppliers' bankers where the supplier has provided this information to us.

3. For both suppliers and customers some but not necessarily all of the information we hold may have been supplied by the supplier or customer.

In accordance with guidance issued by the Information Commissioner's Office (ICO) WSB's legal advisers and auditors may also be considered "joint data controllers" or "data controllers in common" (the holders, users and processors of personal data) for the purposes of the GDPR.

The joint data controllers can be contacted as follows:

The White Sea and Baltic Company Limited, 1st Floor, 32-36 Great Portland Street, London, W1W 8QX
Email: alan.carradice@whitesea.co.uk

Use, transfer and storage of personal data

A comprehensive list of parties with whom data may be shared is set out in WSB's formal Data Mapping document, available on request in writing to the Data Controllers at the address above.

In addition, it is in your and WSB's legitimate interests to use your personal information to:

- Keep up to date and accurate records
so that, inter alia, the correct payments for services provided can be paid
- Comply with the law
so that you, WSB and their advisers are not subject to legal sanctions which may jeopardise WSB.

All data backups to the cloud are held in the United Kingdom.

It is possible that WSB's staff and the partners/staff of adviser firms may take laptops and smartphones with them on trips outside of the UK and/or the EEA, indirectly causing data to be sent outside of the EEA.

We have received guidance that as long as the information stays with the individual on the laptop/smartphone and their employer has an effective procedure to deal with security and the other risks of using laptops (including the extra risks of international travel), it is reasonable to conclude that adequate data protection exists.

Your personal data will not be directly transferred to another country unless you request for this to be done.

Your rights in relation to your data.

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the Data Controller at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then WSB may not be able to perform their duties in relation to processing your charges, and your payments could be affected.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>.