Privacy Policy – WCF North West

WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN (trading as WCF North West) ("We", "the Company", "WCF North West") are committed to protecting and respecting the confidentiality, integrity and security of the personal information we hold about each past or present customer, enquirer, prospect or visitor to our website ("you", "your").

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, and how we comply with our responsibilities under applicable data protection laws ("Data Protection Laws"). Please read this policy carefully and if you have any questions or concerns please contact us using the information below.

Data Controller

For the purposes of the Data Protection Laws, the data controller of your personal information is WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN.

Personal data collection

We only hold personal data about you which you have provided to us or to one of our authorised data processors or has been collected via social media platforms.

Categories of personal data we may collect and hold

We may collect the following information from our customers:

- name;
- contact details including billing and delivery addresses;
- purchasing histories;
- credit card or bank details if applicable; and
- social media metadata
- quiz responses

Purposes for which your personal data is used

We will use the personal data which you provide to us for the following purposes:

- allowing WCF Ltd to process price requests and deliver orders of bulk fuel oils, lubricants, additives and ancillary products such as tanks;
- identifying customers automatically using their telephone number when ringing customer services;
- taking payments in relation to the purchase of products;
- sending out price information and email newsletters;
- · de-duping against alternative and our own databases;

- preventing fraud and enhancing the security of our networks;
- understanding how our customers interact with our websites and personalising their repeat visits;
- determining the effectiveness of our promotional campaigns and advertising;
- responding to queries and complaints; and
- fulfilling our legal and fiduciary responsibilities.

Legal basis for Processing

Legal basis for Processing – Legitimate Interest

In processing customer data WCF relies on the following legal bases:

- Where it is necessary for the performance of our contract with you;
- Where it is necessary for compliance with our legal obligations;
- When you place and order with us we shall rely upon our contractual obligation to process your personal data.
- We will rely on legitimate interests to send you the latest copy of our catalogue and special offers by post. You can ask us to stop sending you the catalogue and or special offers by post at any time by using our preferences dashboard (hyperlink) or by contacting our customer services department who will be happy to help you.
- When you make an enquiry with us or place an order, we will add you to our email and text message service using the <u>soft opt in</u> basis for [product/service updates]. You can decline or opt out at the time or any point in the future.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us but we will notify you at the time.

Disclosure of your personal data

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose personal data to third parties who are providing services to us, in particular to the IT companies that support our order processing, ecommerce and email newsletter systems, to the mailing houses and postal services that distribute our marketing literature and to payment processors for the purposes of order payments and refunds.

We may also disclose personal data we hold to third parties:

- a. in the event that we sell any business or assets, in which case we may disclose personal data we hold to the prospective buyer of such business or assets; and/or
- b. if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party.
- c. Third party marketing partners, such as Google or Social Media Platforms to deliver advertising to you if you are using Google or registered with one or more social media platforms (see further information on Meta below).

We occasionally utilise third parties to undertake bulk fuel oil or lubricant deliveries on our behalf, particularly in geographical locations in which we do not have a presence. In these instances, your name, delivery address, contact information and order details would be passed to the third party, in relation to that delivery only.

Updating your marketing preferences

We have no desire to contact those customers, prospects or enquirers who do not wish to receive marketing correspondence from us. We rely on freely given, specific, informed and unambiguous statements from our customers which signify your agreement to the processing of your personal data for marketing purposes.

If you wish to change your marketing preferences there are various ways in which you can do this:

- by telephone to our sales teams on 01524 733669
- in writing to WCF North West, Station Goods Yard, Warton Road, Carnforth, LA5 9EU
- by email at sales@wcfnw.co.uk; or
- using the <u>online contact form</u>

Access and other rights

You may request to see the personal information we hold about you either digitally or on file at any point by making a request in writing to us via The Company Secretary, WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN or via email on <u>pam.murray@wcf.co.uk</u>. This request will be responded to within 30 working days. You will be provided with a copy of the personal information we hold about you. If we require more time to respond fully to any request, we will notify you in writing within the 30-day period referred to. Any additional copies of any information we provide to you may be subject to a reasonable fee.

You also have other rights under Data Protection Laws in relation to your personal data. In particular, you may have (i) the right to request that we rectify or erase information we hold about you in certain circumstances, (ii) the right to ask us to limit our processing of your information, (iii) the right (if we are processing information based on your consent, such as for marketing purposes) to withdraw your consent, (iv) the right to object to certain processing of your information (including the right to

object to processing of your personal data for direct marketing purposes at any time), (v) the right to ask us to move, copy or transfer your personal information to another organisation.

If you wish to exercise any of these rights, please contact us via the Company Secretary at Crawhall, Brampton, Cumbria, CA8 1TN or via email on <u>pam.murray@wcf.co.uk</u>.

Accuracy of personal data

We try to ensure that the information we hold about you is accurate and kept uptodate and may ask you to re-confirm certain information when you place an order. However, if at any time you believe that any information we are holding about you is inaccurate, out-of-date or incomplete, please notify us in writing via WCF North West, Station Goods Yard, Warton Road, Carnforth, LA5 9EU, by calling <u>01524</u> <u>733669</u> or via email at <u>sales@wcfnw.co.uk</u> as soon as possible. We will promptly correct or delete any information found to be incorrect.

Security

We have put in place what we consider to be appropriate security measures against unlawful or unauthorised processing of the personal data we hold about you, and against the accidental loss of, or damage to, such personal data.

Transferring personal data outside the EEA

Except if appropriate safeguards are in place that are in accordance with applicable law (including Articles 44 to 50 of the EU General Data Protection Regulation 2016/679), we will not transfer any personal data to a country outside of the European Economic Area ("EEA") or to a person based outside the EEA. Such safeguards may include us or one of our data processors entering into EU Standard Contractual Clauses (or their equivalent in the UK) with a third party outside the EEA to whom personal information is being transferred. Further information about the safeguards we may apply can be obtained by contacting the Company Secretary at WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN or via email on pam.murray@wcf.co.uk.

Retention of data

We are committed to ensuring that we do not retain personal data for any longer than is necessary for the purposes for which it was obtained. In the majority of cases, all personal data about you will be deleted 6 years after the date of your last order. Credit card tokens are held until expiry of the credit card.

You can update your marketing preferences at any time by using one of the methods outlined above.

Third Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Changes to this policy

We may make changes to this Privacy Policy at any time. Any changes we make will be posted on this page and, where appropriate, notified to you in writing. Please refer to this page regularly to see any changes or updates to this policy.

Contact

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to the Company Secretary, WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN via email on <u>pam.murray@wcf.co.uk</u> or call 016977 45150

Complaints

If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data in accordance with the Data Protection Laws you have the right to lodge a complaint at the Information Commissioner's Office (<u>https://ico.org.uk/</u>).