





Privacy Policy

WH Bond & Sons Limited ("we", "us", "our") are committed to protecting and respecting your privacy. This policy sets out the basis on which we collect personal data from you and the way in which it will be processed by us. Please read this Policy carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of the relevant data protection legislation, the "controller" (or "data controller") is WH Bond & Sons Limited of Trerule Farm, Trerulefoot, Saltash, PL12 5BL. Questions, comments and requests regarding this Policy are welcomed and should be addressed to enquiries@whbond.co.uk

We keep our privacy policy under regular review. It is important that the personal data we hold about you is current and accurate. Please keep us informed if your personal data changes during your relationship with us.

Our legal basis for collecting your personal data

We collect different types of information about you for the following reasons:

- To provide goods or service to you, either at your request or in order to fulfil an existing contract;
- For our legitimate interests, namely in order to help us monitor or improve the products or services we offer, unless any of those legitimate interests are overridden by any of your interests or fundamental rights and freedom;
- 3. to comply with a legal obligation; and
- 4. If we have your permission, to market specific goods or services to you. We will make sure it is clear when you are able to give us permission to do this.

Accordingly, we do not rely exclusively on consent as a legal basis for processing your personal data although we will get your consent before sending direct marketing communications to you via email or text message or sending you our newsletter. You have the right to withdraw consent to such marketing at any time by contacting us.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the

processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

When do we collect information?

We collect information on you:

- · When you place an order with us or sign up for a trading account;
- When you use any of our websites, including <u>www.whbond.co.uk</u> and <u>www.bondtimber.co.uk</u>, ("our sites") and through the use of cookies; and
- When we speak to you over the phone or correspond with you via email during the ordering process or in the process of managing your account

Types of personal data we collect?

The minimum information we need from you so that you can place an order is your full business trading title, a contact name, contact address, delivery address, telephone number and email address. If we are opening a trading account for you, we will also ask for details of an account contact and two trade references acceptable to us. Failure to provide the above minimum information may lead to us being unable to fulfil your order or opening your trade account.

In processing your order (or opening a trade account), the following additional information may be created and linked to your account:

- order and transaction history (including details about products and services you have ordered and purchased from us),
- invoice details (including details of payments to and from you).
- technical data (see under "Computer Information" below);
- profile data (including your username and password, information about how you use our sites, your preferences, feedback and survey responses).

Please note that when you place an order through our sites, your payment instruction will be processed by a third party payment services provider and we will not receive or keep any personal payment details (see the section "When will we share your personal data?" below).

When we take telephone orders, payment details are immediately processed through our payment services provider (see the section "When will we share your personal data?" below) and are not retained by us.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we may use your personal data

We may use your data in the following ways:

- To provide you with our products and services, which includes managing, processing and despatching your orders as well as processing payments for your orders;
- To provide personalised and secure access to parts of our sites;
- To deliver relevant website content to you;
- To create and manage your customer or credit accounts and keep accurate records of your pending orders and past purchases;
- To contact you regarding your order, or if we change the way that our products or services work;
- To manage our relationship with you, which includes notifying you about changes to our terms or privacy policy and asking you to leave a review or take a survey;
- To email or contact you via telephone about other products and services we think may be of interest to you based on your previous purchases and enquiries (if you have given us permission to do so);
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal obligation;
- To send you our newsletter (if you have given us your permission to do so);and
- To release references to third parties where you have supplied our details to them for such a purpose.

In order to personalise and improve the quality of our services, when you place an order we may also ask you about the nature of your business and how you found us so that we can gain a clearer understanding of who you are. However, you do not need to provide this information in order for us to fulfil your order or open a trading account.

Computer Information

We also collect technical information about you when you visit our site in order to help us monitor or improve the products or services we offer. This information includes the IP address used to connect to our site, browser type and version, time zone setting, operating system and platform. We will also collect information about

your visit to our site, including the full URL used to access our site, the click stream to and from our site, (including the date and time), products which you have viewed or searched for, page response times, any download errors, how long you have visited certain pages, page interaction information including scrolling, click and mouse overs and any methods used to browse away from our site. This helps us to monitor and improve on the products and services we provide. In doing so, we may use your data in the following ways:

- To improve our site so that content is presented in the most effective manner for you and for your computer;
- As part of our efforts to keep our site safe and secure;
- For troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- To provide customers with the opportunity to manage their orders online.

Our website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Please note that we use Google Analytics, which pass "cookies" (text files) to your computer, to help the website analyse how visitors use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google for the purpose of evaluating your use of the website, and compiling reports on website activity and internet usage. You may refuse the use of cookies by selecting the appropriate settings on your browser.

However, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore, you can prevent Google's collection and use of data (i.e cookies and IP address) by downloading and installing the browser plug-in available under https://tools.google.com/dlpage/gaoptout?hl=en-GB . Please visit: http://google.com/intl/en/policies/privacy/ for further information on how Google uses your data.

If we need to process your personal data for a reason which is not outlined above, we shall contact you in order to obtain your prior consent for such use.

When will we share your personal data?

We will not share your personal data with any third parties for marketing purposes without your express consent. We will however, share your personal data with the following parties ("third parties"), for the following reasons:

Selected third parties, such as our payment and delivery providers, suppliers
and sub-contractors, where it is necessary to do so in order to provide you
with goods that you have ordered. As at the date of issue of this privacy policy

this includes Opaya (formerly Sage Pay) (including for MOTO and Pay by Link payments for telephone orders) as a payment processing provider (see https://www.opayo.co.uk/policies) and Dot Digital as a mailshot provider (see https://dotdigital.com/terms/privacy-policy/)

- Google Analytics, to assist us in the improvement and optimisation of our site;
- Credit reference agencies and fraud prevention agencies in order to verify your identity and assess your credit score in order to open a trading account with us; and
- Other companies in the WH Bond & Sons Limited group acting as joint controllers or processors and who are based in the United Kingdom or third parties to whom we may choose to sell transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We reserve the right to disclose or share your personal data in order to comply with any legal requirements, enforce our terms and conditions (www.whbond.co.uk and www.bondtimber.co.uk) or any other agreement we enter into with you, or to protect the rights, property or safety of our business and other customers. This includes exchanging information with other companies and organisations for the purposes of fraud protection, credit risk reduction and in the event of a default of your agreed payment terms.

Where will we store your personal data?

All personal data that you provide to us is safely stored on our secure server. We use our best endeavours to ensure that your data is treated securely and in accordance with this Privacy Policy.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict safeguarding procedures and security features to try to prevent any unauthorised access to your personal data.

We do not transfer your personal data outside the UK.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or

disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How long will we keep hold of your personal data?

How long we store your personal information depends upon the type of information we are holding and the purpose for which we need it.

We will keep your data for the period of time you hold an account with us, to enable us to contact you, keep a record of your past orders and supply you with any new orders. We will not keep your personal information for any longer than necessary to fulfil our obligations to you or to meet our legitimate business interests or legal requirements.

We may keep some data for longer than this if we consider it relevant to any product or service which we have provided to you. This would include when we have provided a warranty longer than this period. The same will apply in the event of a complaint or if we reasonably believe there is a prosect of litigation in respect to our relationship with you.

Where you have given us your permission to contact you for marketing purposes, including receiving our newsletter, we will contact you every five years from the date on which you originally gave your permission to ensure that you still wish to be contacted in this way. You can withdraw your consent to the use of your details for marketing purposes at any time on notice to us.

Your rights

You have the following rights:

- 1. To request that we provide you with a copy of the information we hold about you ("Access Request");
- 2. To request that we rectify any information we hold about you ("Right to Rectification");
- 3. To request that we erase any information we hold about you ("Right to be Forgotten");
- 4. To restrict the level of processing we carry out with your information ("Restriction of Processing");
- To obtain from us all personal data we hold about you in a structured, machine readable form, and have this information transmitted to another organisation ("Data Portability");

- 6. To object to our processing your information in certain ways ("Right to Object"); and
- 7. To withdraw your consent at any time to our processing of your data.

Please see the relevant sections below for further details on your rights as a data subject. You can exercise any of the above rights by emailing us at enquiries@whbond.co.uk stating which right you wish to exert. You also have the right to lodge a complaint with the Information Commissioners Office if you are unhappy in any way with how we treat your personal information.

We will comply with any request made under this section as soon as possible, and normally within one month from the date of your request. However, if necessary, for example if your request is particularly complex or we receive a number of similar requests, we may extend this period by an additional two months, but we will notify you if we need to do this.

Please note that where we receive requests under this section which are manifestly unfounded or excessive, in particular because of their repetitive character, we may:

- Charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
- 2. Refuse to act on the request.

1. Access Request

You have the right to request a copy of the information that we hold about you at any time. Please note that in most circumstances, we will not make a charge for this, however we may make a reasonable fee based on administrative costs for any further copies requested.

2. Right to Rectification

You have the right at any time to ask us to rectify any personal data that we hold for you which is incorrect or incomplete.

If we have disclosed any incorrect or incomplete data to any third parties, we shall inform them of any necessary amendments or corrections made to your personal data under this section.

Right to be Forgotten

You have the right to ask us to erase the personal data we hold about you in circumstances where:

- 1. It is no longer necessary for us to handle your personal data for the purpose for which it was originally collected;
- You have withdrawn your permission for us to hold your personal data (where this was the basis on which it was collected or used);

- 3. You object to the processing of the data and there was no lawful overriding reason for us to continue processing your personal data;
- 4. The personal data was unlawfully processed; or
- We have to erase your personal data in order to comply with a legal obligation.

4. Restriction of Processing

You can ask us to restrict how we use your data in the following circumstances:

- Where you believe that the information we hold about you is inaccurate, you
 can ask that we refrain from using your data until we can verify the accuracy
 of it;
- 2. Where we have unlawfully processed your data, you can ask that we restrict our usage of it rather than erase it completely; or
- Where we no longer need to hold your information, but you wish us to retain your information for the purpose of establishing, exercising or defending a legal claim.

5. Data Portability

You have the right to obtain from us all personal data which you have provided to us in a structured, commonly used and machine readable form, provided that such data was processed based on your consent, or for the purpose of a contract between us and the processing was carried out by automated means.

This will allow you to move, copy or transfer personal data easily from one IT environment to another. Alternatively, we can transmit such data directly to another organisation.

Please note that we will not be able to comply with a data portability request if this will affect the rights and freedoms of others.

6. Right to Object

You have the right to object, on grounds relating to your particular situation, to our processing of your personal data where we are doing this for the performance of a task carried out in the public interest (which we will have told you about, if applicable), or where we are carrying out processing for the purposes of legitimate interests pursued by us.

7. Withdrawal of consent

You also have the right at any time to ask us not to process your personal data for direct marketing or profiling purposes (to the extent that such profiling is related to such direct marketing). We will have informed you before the time we obtained your

personal data whether we intend to process your personal data for this purpose, or if we intend to disclose your information to any third party for such purposes.

Third Party Websites

Our site may contain links to our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for them. We advise you to check these policies before you submit any personal data to these websites.

This policy has been authorised by:

Name: ALISON BOND Signed: ALISON Date: 21-11-22