

### **BACKGROUND:**

Finefair Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients OR and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### **1. Information About Us**

Finefair Limited, is a company registered in the UK under number 04661895, whose registered office is at Unit 1, The Point, 420a Eastern Avenue, Gants Hill, IG2 6NQ (“the Company”)

Data Protection Manager: Jayne Walcott

Email address: [info@finefair.com](mailto:info@finefair.com), [Jayne@finefair.com](mailto:Jayne@finefair.com)

Telephone number: 020 8554 0500

Postal Address: Unit 1, The Point, 420a Eastern Avenue, Gants Hill, IG2 6NQ

#### **2. What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### **3. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### **4. What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you

how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way or Part 6 explains more about how we use your personal data.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Personal Data Do You Collect?**

We may collect the following information:

- Your name, address and telephone number
- Information to enable us to check and verify your identity, e.g. your date of birth or passport details
- Electronic contact details, e.g. your email address and mobile phone number
- Financial information, including your bank and/or building society details
- Information to enable us to undertake a credit or other financial checks on you
- Information about your use of our IT, communication and other systems, and other monitoring information
- Your medical or health records
- Equal opportunities monitoring information

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.

- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by informing us).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

For further information on why and how we keep data, you may request to see our Data Protection Policy.

## 7. **How Long Will You Keep My Personal Data?**

As stated above, and as required by law, the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.

Different types of personal data, used for different purposes, may be retained for different periods (and its retention periodically reviewed).

When establishing and/or reviewing retention periods, the following shall be taken into account:

- a) The objectives and requirements of the Company;
- b) The type of personal data in question;
- c) The purpose(s) for which the data in question is collected, held, and processed;
- d) The Company's legal basis for collecting, holding, and processing that data;
- e) The category or categories of data subject to whom the data relates;

If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.

Notwithstanding the defined retention period, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 12 years after the date it is no longer needed by us for any of the purposes listed above. The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or

- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the GDPR.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

If the need arises, we will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the European Commission.

Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

## 9. **Security Of Your Data**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

## 10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

We may sometimes contract with third parties to supply services to you on our behalf. These may include payment processing, delivery, and marketing.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details

of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receipt. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details):

Data Protection Manager: Jayne Walcott

Email address: [info@finefair.com](mailto:info@finefair.com), Jayne@finefair.com

Telephone number: 020 8554 0500

Postal Address: Unit 1, The Point, 420a Eastern Avenue, Gants Hill, IG2 6NQ

## 13. **How to Complain?**

We hope that our Data Protection Manager can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>.

## 14. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website: [www.finefair.com](http://www.finefair.com)

**Updated: 23.05.18**