

Semmco LPS Limited (company registration no: 09240524) is incorporated in England with limited liability. The registered office address is 9 Kestrel Way, Goldsworth Park Industrial Estate, Woking, Surrey GU21 3BA.

Semmco LPS respects your privacy and is committed to protecting your personal data. This privacy policy explains how we look after any personal information we collect about you when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you. The policy aims to give you information on how we collect and process your data through your use of this website, including any data you may provide through this website when you sign up for our news updates or contact us through the website.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

What information do we collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity data** includes first name, last name, user name or similar identifier, marital status and gender.
- **Contact data** includes company name, e-mail address and telephone numbers.
- **Technical data** includes internet protocol (IP) address, your log in data, browser type and version, time zone setting and location, browser plug in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile data** includes your interests and preferences.
- **Usage data** includes information about how you use our website, products and services.
- **Marketing and communications data** includes your preferences in receiving marketing from us and your communication preferences.

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 is your personal data collected?

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

- **Direct interactions.** You may give us your name and contact details by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:
 - Complete our contact form.
 - Subscribe to our news service.
 - Request information about future products or services to be sent to you.

- **Automatic technologies or interactions.** As you interact with our website, we will automatically connect technical data about your equipment, browsing options and patterns. We collect this personal data by using cookies and other similar technologies. Cookies are text files placed on your computer to collect standard internet log in information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:
 - Analytical providers such as Google based outside the EU.
 - Search information providers based inside or outside the EU.

How will we use the information about you?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- When we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights to not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via e-mail. You have the right to withdraw consent to marketing at any time by contacting us.

We collect information about you to process your order, manage your account and, if you agree, to email you about other products and services as well as news about the company which we think may be of interest to you. We use your information collected from the website to personalise your repeat visits to our website. If you agree, we shall pass on your personal information to our group of companies so that they may offer you their products and services.

We have set out below in a table format a description of the ways in which we plan to use your personal data and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using the data.

Purpose of Activity	Type of Data	Lawful Basis
To register you as a potential new customer	Identity data Contact data	Performance of a contract with you
Notifying you about changes to your terms or privacy policy	Profile data	Necessary to comply with a legal obligation

To administer and protect our business and this website including trouble shooting, data analysis, testing, system maintenance, support, reporting and hosting of data	Identity, contact and technical data	Necessary for our legitimate interests for running our business, the provision of administration and IT services, network security and to prevent fraud. This is also necessary to comply with legal obligations
To deliver relevant website content to you and to measure and understand the effectiveness of the marketing we provide to you	Contact, profile, usage and marketing and communications data	Necessary for our legitimate interest in studying how customers use our products and services, to develop them and grow our business and inform our marketing strategy
The use of data analytics to improve our website and experiences	Technical and usage data	Necessary for our legitimate interests in keeping our website updated and relevant to develop our business and inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity, contact, technical usage, profile and marketing communications data	Necessary for our legitimate interests to develop our products and services and grow our business

Occasionally we may need to share personal information with third parties such as professional advisers (lawyers and accountants), relevant authorities (HMRC, police or the local authority) or credit reference agencies.

For the most part, personal data collected by the company will remain within the company and be processed by appropriate individuals only on a need to know basis. Finally, some of the company's processing activities carried out on its behalf by third parties such as IT systems, web hosting or cloud service and storage providers. This is always subject to undertakings from such third parties that personal data will be kept securely and only in accordance with the company's specific direction.

Marketing

We would like to send you information about products and services, events and news of ours and other companies in our group which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the Semcco Group. If

you no longer wish to be contacted for marketing purposes please send an email to sarah@semcco.com to request unsubscribing from our database.

Data security

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

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of any complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means as well as the applicable legal regulatory, tax, accounting or other requirements.

Your legal rights Under certain circumstances, you have rights under the Data Protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a data subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. We may need you to provide information to confirm your identity and to ensure your right to access your personal data. This is a security measure we take to ensure that personal data is not disclosed to any person who has no right to receive it. We try to respond to all legitimate requests within one month, although if your request is particularly complex or if you have made a number of requests, it may take longer, in which case we will notify you and keep you updated.
- Request correction. You may request that we correct personal data that we hold about you which enables you to have any complete or inaccurate data corrected. We may need to verify the accuracy of the new data that you provide to us.
- Erasure. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note however that we are not always able to comply with your request for specific legal reasons which would be notified to you if relevant.
- Object to the processing of your personal data. You have the right to object where there is something about your particular situation where you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Restriction of processing. This enables you to ask us to suspend the processing of your personal data in the following situations:
 - If you want us to establish the accuracy of the data.
 - Where our use of the data is unlawful but you do not want us to erase it.

- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend all your claims.
- Where you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or any third party.
- To withdraw your consent where we are relying on your consent to process the data. However, this will not affect the lawfulness of processing which is carried out before you withdraw your consent.

Other websites

Our website contains links to other websites plug-ins and applications. Clicking on these 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. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 1 October 2018.

How to contact us

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to the privacy policy or any privacy notices.

If you have any questions about our privacy policy or the information we hold about you or if you want to exercise any of your rights mentioned above, please contact our Data Protection Officer in the following ways:

Semmco LPS Limited

by email to sarah@semcco.com

or write to: the Data Protection Officer, Semmco Limited, 9 Kestrel Way, Woking GU21 3BA, UK

Or telephone the Data Protection Officer on 01483 757200

You have the right to make a complaint at any time to the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would however appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.