

## Waxman Group Ltd - PRIVACY POLICY

### 1. GENERAL

**Waxman Group Ltd** together with any group companies (“we” “us” “our”) are committed to protecting and respecting your privacy. For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### 2. VISITORS TO OUR WEBSITE

2.1 We may collect and process personal data about you in the following circumstances:

- 2.1.1 when you complete forms on our website (“Site”). This can include, but is not limited to, **Name, E-Mail Address, Company/Trading Address, VAT Number, Phone Number and various CPS Registration Numbers (MCS, RECC, OLEV etc)** which are provided at the time of registering to use our Site, where you ask us to contact you about our goods or services, subscribe to our mailing list, or subscribe/request or goods or services;
- 2.1.2 whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;
- 2.1.3 details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access (see section 2.2.2 on Cookies below);
- 2.1.4 whenever you disclose your information to us, or we collect information from you in any other way, through our Site.

2.2 We may also collect data in the following ways:

#### IP Address

- 2.2.1 We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device's operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

#### Cookies

- 2.2.2 Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy in **Appendix 1** of this document.

2.3 We may use your personal data for our legitimate interests in order to:

- 2.3.1 provide you with information, or services that you requested from us;
- 2.3.2 allow you to participate in interactive features of our Site, when you choose to do so;
- 2.3.3 ensure that content from our Site is presented in the most effective manner for you and for your device;
- 2.3.4 improve our Site and services;
- 2.3.5 process and deal with any complaints or enquiries made by you; and
- 2.3.6 contact you for marketing purposes where you have signed up for these (see section 6 for further details).

#### Website Links

Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of

your personal data and we do not accept any responsibility or liability for these policies. When you leave our Site, we encourage you to read the privacy notice/policy of every website you visit.

### **3. CUSTOMERS**

- 3.1 We will collect details including, but not limited to, **Name, E-Mail Address, Company/Trading Address, VAT Number, Phone Number and various CPS Registration Numbers (MCS, RECC, OLEV etc)** when you order goods or services from us either via our Site, MOTO, email communication or account application forms. We will use this information to process your order and comply with our contractual obligations.
- 3.2 In order to perform our contact with you, we may also need to share personal data with third parties such as payment providers, training/awarding organisations and postal service organisations to assist in the delivery of goods or services you have ordered;
- 3.3 We may also advertise your feedback on our website and marketing materials (subject to obtaining your prior consent where necessary);
- 3.4 We will retain your information as long as we require this to provide you with the goods or services ordered from us and for a period of time as defined by the appropriate regulatory body or government agency. Where you have subscribed to receive marketing correspondence from us we will keep your personal data for the period of time described in section 6 below.

### **4. SUPPLIERS**

We will collect details including, but not limited to, **Name, E-Mail Address, Company/Trading Address, VAT Number, Phone Number and various CPS Registration Numbers (MCS, RECC, OLEV etc)** in order to contact you about goods or services ordered with you, to place further orders and to pay you for the goods and/or services supplied. We will retain your information as long as we require this to provide you with the goods or services ordered from us and for a period of time as defined by the appropriate regulatory body or government agency. Where you have subscribed to receive marketing correspondence from us we will keep your personal data for the period of time described in section 6 below.

### **5. 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 the data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example to provide you with our goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **6. MARKETING**

- 6.1 In addition to the uses described in sections 2-4 above, where you indicate you would like to receive marketing correspondence from us, subscribe to our mailing lists or newsletters, enter into any of our competitions or provide us with your details at networking events we may use your personal data for our legitimate interests in order to provide you with details about our goods, services, business updates and events which we think may be of interest.
- 6.2 You have the right to opt-out of receiving the information detailed in section 6.1 at any time. To opt-out of receiving such information you can:
  - 6.2.1 tick the relevant box situated in the form on which we collect your information;
  - 6.2.2 clicking the unsubscribe button contained in any such communication received; or
  - 6.2.3 email us at [datarequests@waxmangroup.co.uk](mailto:datarequests@waxmangroup.co.uk) providing us with your name and contact details.
- 6.3 Where you have subscribed to receive marketing correspondence from us we will keep personal data for 5 years from when you provide us with your consent or from when you are provided with the opportunity to opt-out. Where "active engagement" can be established, we reserve the right to retain personal data indefinitely.

### **7. MONITORING AND RECORDING**

We may monitor and record communications with you such as telephone communications and emails for the purpose of quality assurance, training, fraud prevention and compliance. We also have CCTV cameras installed in our premises for the purpose of crime prevention and for health and safety reasons. We retain such information for no more than 365 days from the date of capture.

### **8. AUTOMATED PROCESSING**

- 8.1 We may carry out a credit check on our customers:

8.1.1 so that we can make credit decisions about you; and

8.1.2 to prevent fraud and money laundering.

8.2 Our search will be recorded on the files of the credit reference agency.

8.3 If further to undertaking a credit check you receive a low credit score, we reserve the right not to supply you with goods or services on credit and/or require upfront payment for the goods or services you wish to purchase.

8.4 If you provide false or inaccurate information and we suspect fraud, we will record this. If you want to see your credit file, please contact the credit agency we use Graydon UK Ltd.

## **9. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

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

9.1.1 for performance of a contract we enter into with you;

9.1.2 where necessary for compliance with a legal or regulatory obligation we are subject to; and

9.1.3 for our legitimate interests (as described within this policy) where your interests and fundamental rights do not override these interests.

## **10. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

10.1 In addition to the third parties mentioned above, we may disclose your information to third parties for our legitimate interests as follows:

10.1.1 to staff members in order to facilitate the provision of goods or services to you;

10.1.2 to our affiliated entities to support internal administration;

10.1.3 IT software providers that host our website and store data on our behalf;

10.1.4 professional advisers including consultants, lawyers, bankers and insurers who provide us with consultancy, banking, legal, insurance and accounting services;

10.1.5 HM Revenue and Customs, regulators and other authorities who require reporting of processing activities in certain circumstances; and

10.1.6 third parties who we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other business 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.

10.2 We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

10.3 We will not sell or distribute personal data to other organisations without your approval.

## **11. CROSS-BORDER DATA TRANSFERS**

11.1 Where permitted by applicable law, we may transfer your personal data to the United States and other jurisdictions outside the European Economic Area ('EEA') for the purposes set out in this privacy policy. We have implemented binding corporate rules/standard contractual clauses approved by the European Commission/the EU-US Privacy Shield consent to secure the transfer of your personal data to jurisdictions outside the EEA.

## **12. DATA SECURITY**

12.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

- 12.2 Unfortunately, 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 information transmitted to our Site; any transmission is at your own risk.
- 12.3 Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

### **13. ACCESS TO, UPDATING, DELETING AND RESTRICTING USE OF PERSONAL DATA**

- 13.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.
- 13.2 Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, please send an email to [datarequests@waxmangroup.co.uk](mailto:datarequests@waxmangroup.co.uk). In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.
- 13.3 You can also ask us to undertake the following:
- 13.3.1 update or amend your personal data if you feel this is inaccurate;
  - 13.3.2 remove your personal data from our database entirely;
  - 13.3.3 send you copies of your personal data in a commonly used format and transfer your information to another entity; or
  - 13.3.4 restrict the use of your personal data.
- 13.4 We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.
- 13.5 Please send any requests relating to the above to our Data Protection Team at [datarequests@waxmangroup.co.uk](mailto:datarequests@waxmangroup.co.uk) specifying your name and the action you would like us to undertake.

### **14. RIGHT TO WITHDRAW CONSENT**

Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, please contact us at [datarequests@waxmangroup.co.uk](mailto:datarequests@waxmangroup.co.uk).

### **15. CHANGES TO OUR PRIVACY POLICY**

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. Please check periodically for any updates. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

### **16. CONTACT US**

We have appointed a Data Protection Team to oversee compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our Data Protection Team at [datarequests@waxmangroup.co.uk](mailto:datarequests@waxmangroup.co.uk).

This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>

Last updated: 24<sup>th</sup> May 2018.

## APPENDIX 1

### Cookie Policy for Waxman Group Ltd

This Cookie Policy covers all websites owned and operated by Waxman Group Ltd

#### **What Are Cookies**

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer to improve your user experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored, however, this may downgrade or 'break' certain elements of the sites functionality.

#### **How We Use Cookies**

We use cookies for a number of different reasons, including but not limited, helping us to remember and process the items in your shopping cart, understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. A list of cookies that are captured can be found at the end of this document.

Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to websites. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

#### **Disabling Cookies**

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in disabling certain functionality and features of all websites owned and operated by Waxman Group Ltd. Therefore, it is recommended that you do not disable cookies.

#### **The Cookies We Set**

Below are some examples of how we use cookies on our websites, a full list of cookies which we use can be found in the table blow.

- **Account related cookies**

If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.

- **Login related cookies**

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

- **Email newsletters related cookies**

Our sites can offer newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

- **Orders processing related cookies**

Our sites, in some cases, offer e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.

- **Forms related cookies**

When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

- **Site preferences cookies**

In order to optimise your user experience on our sites, we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

- **Third Party Cookies**

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

Our websites use Google Analytics; one of the most widespread and trusted analytics solution on the web for helping us to understand how you interact with our websites and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. In addition, Google may use data collected to contextualise and personalise the ads of its own advertising network.

For more information on Google Analytics cookies, see the official Google Analytics page.

The Google Analytics privacy policy can be found here:

<https://policies.google.com/privacy?hl=en>

You have the right to opt of Google Analytics, information on how to do this can be found here:

<https://tools.google.com/dlpage/gaoptout?hl=en>

From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features, these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.

As a wholesaler of products, it's important for us to understand statistics about how many of the visitors to our websites actually make purchases and as such this is the kind of data that these cookies will track.

We also use social media buttons and/or plugins on our websites that allow you to connect with your social network in various ways. For these to work the following social media sites including; Facebook, LinkedIn, Instagram & Twitter will set cookies through our websites which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

### **More Information**

It is our aim to be clear and transparent about the use of cookies on our websites; the functionality of this data enables us to offer an optimised user experience and the opportunity to improve our services in the future.

However, should you require any further information, please feel free to contact us via our dedicated email address:

Email: [datarequests@waxmangroup.co.uk](mailto:datarequests@waxmangroup.co.uk)

## List of cookies that we collect

Below is a list of all cookies used across websites owned and operated by Waxman Group Ltd:

| COOKIE NAME                             | COOKIE DESCRIPTION  |
|---|---|
| AB                                      | Used for AB testing of new features.  |
| ADS                                     | Tracks if a visitor has clicked an ad before.   |
| AKM_MOBILE                              | Stores whether a user has chosen to view the mobile version of a site.                |
| BOTDLANG                                | Used to track the language a user has selected to view popular blogs in.              |
| CART                                    | The association with your shopping cart.  |
| CATEGORY_INFO                           | Stores the category info on the page, that allows to display pages more quickly.      |
| COMPARE                                 | The items that you have in the Compare Products list.                                 |
| COOKIE TEST                             | Checks if cookies are enabled to provide appropriate user experience.                 |
| CURRENCY                                | Your preferred currency   |
| CUSTOMER                                | An encrypted version of your customer id with the store.                              |
| CUSTOMER_AUTH                           | An indicator if you are currently logged into the store.                              |
| CUSTOMER_INFO                           | An encrypted version of the customer group you belong to.                             |
| CUSTOMER_SEGMENT_IDS                    | Stores the Customer Segment ID  |
| EXTERNAL_NO_CACHE                       | A flag, which indicates whether caching is disabled or not.                           |
| FORM_KEY                                | Stores randomly generated key used to prevent forged requests.                        |
| FRONTEND                                | Your session ID on the server.  |
| GUEST-VIEW                              | Allows guests to edit their orders.   |
| LAST_CATEGORY                           | The last category you visited.  |
| LAST_PRODUCT                            | The most recent product you have viewed.  |
| MAGE-CACHE-SESSID                       | Facilitates caching of content on the browser to make pages load faster.              |
| MAGE-CACHE-STORAGE                      | Facilitates caching of content on the browser to make pages load faster.              |
| MAGE-CACHE-STORAGE-SECTION-INVALIDATION | Facilitates caching of content on the browser to make pages load faster.              |
| MAGE-CACHE-TIMEOUT                      | Facilitates caching of content on the browser to make pages load faster.              |
| MAGE-TRANSLATION-FILE-VERSION           | Facilitates translation of content to other languages.                                |
| MAGE-TRANSLATION-STORAGE                | Facilitates translation of content to other languages.                                |
| NEWMESSAGE                              | Indicates whether a new message has been received.                                    |
| NO_CACHE                                | Indicates whether it is allowed to use cache.   |
| NUX_FLOW_NAME                           | Identifies which user signup flow was shown to the user.                              |
| PERSISTENT_SHOPPING_CART                | A link to information about your cart and viewing history if you have asked the site. |
| PHPSESSID                               | Your session ID on the server.  |
| POLL                                    | The ID of any polls you have recently voted in.                                       |
| POLLN                                   | Information on what polls you have voted on.  |
| PRIVATE_CONTENT_VERSION                 | Facilitates caching of content on the browser to make pages load faster.              |
| RECENTLYCOMPARED                        | The items that you have recently compared.  |
| SECTION-DATA-IDS                        | Facilitates caching of content on the browser to make pages load faster.              |
| SIGNUP_PARTNER_REF                      | Tracks the source of new user signups.  |
| SIGNUP_REFERRER                         | Tracks the source of new user signups.  |
| STF                                     | Information on products you have emailed to friends.                                  |
| STORE                                   | The store view or language you have selected.   |
| TK_NI TK_AI TK_QS                       | Collection of internal metrics for user activity, used to improve user experience.    |
| TWOSTEP_AUTH                            | Set when the user is logged in using two factor authentications.                      |
| USER_ALLOWED_SAVE_COOKIE                | Indicates whether a customer allowed the use of cookies.                              |
| VIEWED_PRODUCT_IDS                      | The products that you have recently viewed.   |
| WISHLIST                                | An encrypted list of products added to your Wishlist.                                 |
| WISHLIST_CNT                            | The number of items in your Wishlist.   |
| WORDPRESS_ELI                           | Reduces display of ads for repeat visitors.   |
| WORDPRESS_LOGGED_IN*                    | Used to check whether the current visitor is a logged in WordPress.com user.          |
| WP_SHARING_{ID}                         | Used to track whether or not a user has already performed an action.                  |
| WP-SETTINGS-{USER_ID}                   | Used to persist a user's wp-admin configuration.                                      |
| X-MAGENTO-VARY                          | Facilitates caching of content on the server to make pages load faster.               |