

Locker Group Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.3 Our website incorporates privacy controls which affect how we will process your personal data.

2. Credit

- 2.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) The general categories of personal data that we may process;
 - (b) In the case of personal data that we did not obtain directly from you, the source and specific categories of that data
 - (c) The purposes for which we may process personal data
 - (d) The legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google analytics and a statistical analysis package installed on our server. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and

employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

- 3.5 We may process your personal data that is provided in the course of the use of our services ("**service data**"). The service data may include *your name, email address, phone number and company name*. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.6 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.7 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.
- 3.8 We may process information relating to transactions, including purchases of goods and services that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions] The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.
- 3.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and

record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

- 3.11 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.12 Not applicable
- 3.13 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject.
- 3.14 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 4.3 We may disclose data collected via our websites to our suppliers or subcontractors insofar as reasonably necessary for website development and marketing *purposes*.
- 4.4 Not applicable
- 4.5 We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- 4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. International transfers of your personal data

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to [countries outside the European Economic Area (EEA)].
- 5.2 We have offices and facilities in the UK. The European Commission has made an "adequacy decision" with respect to [the data protection laws of this country. Transfers to this country will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the European Commission.
- 5.3 The hosting facilities for our website are situated in the UK. The European Commission has made an "adequacy decision" with respect to the data protection laws of this country. Transfers to this country will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the European Commission.
- 5.4 Our *subcontractors* are situated in the UK. The European Commission has made an "adequacy decision" with respect to [the data protection laws of this countries. Transfers to this country will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the European Commission.
- 5.5 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain and delete your personal data as follows:
 - (a) *Personal data* will be retained for *3 years* following *submission*, at the end of which period it will be deleted from our systems.
- 6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:
 - (a) the period of retention of *personal data category* will be determined based on *current business requirements*.
- 6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Amendments

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

8. Your rights

- 8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
 - (a) The payment of a fee (currently fixed at GBP 50); and
 - (b) The supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 8.2 We may withhold personal information that you request to the extent permitted by law.
- 8.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

9. About cookies

- 9.1 See separate cookie policy document

10. Cookies that we use

- 10.1 See separate cookie policy document

11. Cookies used by our service providers

- 11.1 See separate cookie policy document

12. Managing cookies

- 12.1 See separate cookie policy document

13. Our details

- 13.1 This website is owned and operated by the Locker Group Ltd.
- 13.2 We are registered in England and Wales under registration number 5608946 and our registered office is in Warrington.

13.3 Our principal place of business is in Farrell Street, Warrington, WA1 2WW

13.4 You can contact us:

- (a) By post, using the postal address given above;
- (b) Using our website contact form;
- (c) By telephone, on the contact number published on our website.
- (d) By email, using the email address published on our website.

14. Data protection officer

14.1 Our data protection officer's contact details are:

Telephone: (0)1925 406600

Email: privacy@lockergroup.com