

WADE GROUP INCLUDING CONNECTED COMPANIES (The Company)

GDPR PRIVACY NOTICE FOR CUSTOMERS, SUPPLIERS, SUB-CONTRACTORS AND PROFESSIONAL ADVISORS

	Select
Data Controller	<input type="checkbox"/> Wade Group Limited, Estate Office, Ravenstone Hall, Ashby Road, Ravenstone, Leicestershire, LE67 2AA, Tel 01530 816060
	<input type="checkbox"/> Wade Furniture Group Limited, Estate Office, Ravenstone Hall, Ashby Road, Ravenstone, Leicestershire, LE67 2AA, Tel 01530 816060
	<input type="checkbox"/> Wade Furniture Group Investments Limited, Estate Office, Ravenstone Hall, Ashby Road, Ravenstone, Leicestershire, LE67 2AA, Tel 01530 816060
	<input checked="" type="checkbox"/> Wade Spring Limited, Highfield Street, Long Eaton, Nottingham, NG10 4HL, Tel 0115 9463000
	<input type="checkbox"/> Springform Technology Limited, Highfield Street, Long Eaton, Nottingham, NG10 4HL, Tel 0115 9463000
Controller's representative / Data Compliance Manager	<input type="checkbox"/> For Wade Group Limited, Wade Furniture Group Limited and Wade Furniture Group Investments Limited The Group Financial Director, Wade Group Limited, Estate Office, Ravenstone Hall, Ashby Road, Ravenstone, Leicestershire, LE67 2AA, Tel 01530 816060
	<input checked="" type="checkbox"/> For Wade Spring Limited and Springform Technology Limited The Financial Director, Wade Spring Limited, Highfield Street, Long Eaton, Nottingham, NG10 4HL, Tel 0115 9463000

The Company collects and processes personal information, or personal data, relating to its customers, suppliers, sub-contractors and professional advisors (including employees and representatives of those customers, suppliers, sub-contractors and professional advisors) to manage the working relationship. This personal information may be held by the Company on paper or in electronic format.

The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018. The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information both during and after your working relationship with the Company. We are required under the GDPR to notify you of the information contained in this privacy notice.

This privacy notice applies to all current and former customers, suppliers, sub-contractors and professional advisors (including employees and representatives of those customers, suppliers, sub-contractors and professional advisors). It is non-contractual and does not form part of any contract for purchase or supply of goods or services.

The Company has appointed the Controllers representative to oversee compliance with this notice. If you have any questions about this privacy notice or about how we handle your personal information, please contact the Controllers representative.

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**Use, transfer and storage of personal data**

In the course of conducting business with you, or exploring the possibility of conducting business with you, we may request, collect, be provided with or hold any of the following personal information about you:

Personal details including name, gender, postal and/or email address and telephone number.

Bank account details (including debit and/or credit card details) for payment of amounts due or receipt of amounts owed.

Your personal data is not publicly accessible and will be stored until such time as it is no longer needed.

The company may share your data with:

Other companies within the Wade Group of connected companies

Our sub-contractors and sub-processors

Our bankers

Our Insurers and Insurance Brokers (including Credit Insurers and Credit Insurance Brokers)

Our Legal and Professional advisors

Our Auditors

Credit Status Agencies

Debt Collectors

HMRC

The company will use your data to:

Perform a contract or arrangement with you, including steps preparatory to such a contract or arrangement, and to exercise our legal rights under any such contract or arrangement

Comply with any Legal Obligation

Exercise our legitimate interests by

Keeping up to date and accurate records about you

Undertaking risk-management exercises

The company has conducted due diligence on its suppliers, sub-contractors and sub-processors to ensure that they process data within the UK and/or the EEA. It is possible that company employees and those of adviser firms may take laptops / smartphones with them on trips outside of the UK and/or the EEA, indirectly causing data to be sent outside of the EEA.

We have received guidance that as long as the information stays with the individual on the laptop / smartphone and the company has an effective procedure to deal with security and other risks of using laptops (including the extra risks of international travel), it is reasonable to conclude that adequate data protection exists.

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If your personal data will be transferred overseas, we will ensure that the transfer is to a country covered by a decision of the Commission of the European Union or is otherwise made in circumstances where appropriate safeguards are in place to protect your data in accordance with Data Protection Laws.

#### **Your rights in relation to your data**

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

You have the right to access your personal data. If you wish to request copies of your personal data please contact the Data Controller's representative at the address above.

You have the right to have your personal data rectified if it is inaccurate or incomplete.

You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.

You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.

You have a right to lodge a complaint about the data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the company may not be able to perform its part of any contract or arrangement with you.

#### **Changes to this privacy notice**

The Company reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk>.

The Company's Data Protection Policy can be found on the following website <https://wade-spring.co.uk>