

Privacy Policy – V1.1 Revised May 2022

ABOUT US

Cutler and Woolf (Steel) Ltd ("We") are committed to protecting and respecting your privacy. For the purposes of the relevant data protection legislation, the "Data Controller" is Cutler and Woolf (Steel) Ltd Unit 32 Jubilee Trade Centre, Jubilee Road, Letchworth, Herts, SG6 1SP. This Policy sets out the basis on which we collect personal data (as defined below) from you and the way in which it will be processed by us. Please read this Policy carefully to understand our views and practices regarding your personal data and how we shall treat it. It is important that you read this Policy together with any other privacy notice or fair processing notice that 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 personal data. This Policy supplements any other such notices and is not intended to override them. If you have any questions about this Policy, including if you wish to send us a request to exercise any of your legal rights, please email us at info@cutlerandwoolf.co.uk or call us on 01462 480420.

WHY WE COLLECT INFORMATION

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:

1. To provide products or services to you, either at your request or in order to fulfil an existing contract;
2. Where we need to comply with a legal or regulatory obligation; or
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

"**Legitimate Interest**" means the interest of our business in conducting and managing our business to enable us to give you the best service or product and the secure experience. We ensure that we consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

TYPES OF PERSONAL DATA WE COLLECT

"**Personal data**" means any information which identifies (or from which you can be identify) a natural person. We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- "**Identity Data**", which comprises your first name, last name, and title.
- "**Contact Data**", which comprises your business address(es), email address(es), and telephone number(s).
- "**Financial Data**", which comprises your business' bank account details.

- **“Transaction Data”**, which comprises details about payments to and from you and details of products or services you have purchased from us.
- **“Profile Data”**, which comprises purchases or orders made by you, your personal preferences, feedback and survey responses. This may also include details of conversations we have had (excluding Special Categories of personal data, as defined below).
- **“Usage Data”**, which comprises information about how you use products and services.
- **“Marketing and Communications Data”**, which comprises your preferences in receiving marketing from us and your communication preferences.

Special Categories of Personal Data

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). We also do not collect any information about criminal convictions and offences. We do not knowingly collect any personal data about children.

Minimum Required Information

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 minimum required 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 the product or service you have purchased). In that event, we may have to cancel our agreement with you to provide a product or service you have ordered, and will notify you if this is the case at the time. For example, if you have asked us to open a trading account for you, we may ask for details of trade references in order to assess your application and complete our identity, money laundering and credit checks before we are able to open an account for you.

WHEN WE COLLECT INFORMATION

We may collect information on you in the following ways:

- **Information that you voluntarily provide to us.** When you place an order with us or sign up for a trading account, consult with our customer service team, send us an email or enquiry, fill in forms on our website, enter a competition, promotion or survey, or communicate with us in any way, you are voluntarily giving us information that we collect. We also collect information you give to us when we contact you during the ordering process or in the process of managing your account. That information may include your Identity Data, Contact Data, Financial Data, Transaction Data, Profile Data and Marketing and Communications Data.
- **Information that we collect automatically.** When you browse our website, we do not collect information about your visit to our website and your web browsing from which we are able directly or indirectly to identify you. Our use of cookies and similar technologies is explained more fully in our Cookie Policy, which can be found at <https://www.cutlerandwoolf.co.uk/documents/>
- **Information from other sources.** From time to time we may obtain information about you from third party sources, such as public databases (for example, Companies House), and other third-party data providers. We take steps to ensure that such third parties are legally permitted or required to disclose such information to us. We use this information, alone or in combination with other

information (including personal data) we collect for credit risk and fraud reduction and to develop and provide you with more relevant products features, and services.

HOW WE USE YOUR INFORMATION

We have set out below a description of all the ways we intend to use any personal data, and which of the legal bases we intend to rely on in order to do so. We have also identified what our legitimate interests are where appropriate. You can obtain further information about how we assess our legitimate interests against any potential impact on you in relation to specific activities by contacting us. We may use and disclose your personal information for the following purposes:

- I. **Processing your order.** In processing your order (or opening a trading account), we will use your Identity Data, Contact Data, Financial Data, Transaction Data, Profile Data and Marketing and Communications Data in order to provide you with our products and services, which includes managing, processing and despatching your orders as well as processing payments. We will also use this information to manage your customer or credit accounts and to keep adequate records of your past purchases, as well as to contact you regarding your order.
- II. **To manage our relationship with you.** We may send you important updates about changes to the way in which our products or services work. We may also, unless you have opted-out, send you information electronically about products or services which are similar to those you have already purchased from us previously. Where you have purchased products or services from us, we may also ask you to complete a review or survey about our products or service. This is necessary in order to keep you updated about products and services you have purchased, develop our range of products and services, and grow our business. We may also keep records of conversations we have had in the past in order to maintain and develop our relationship with you; any information we collect will typically relate to your preferences and we will never store and sensitive (or “Special Categories” of) personal data about you.
- III. **Marketing.** If we have obtained your express opt-in consent, we may send you marketing materials, for example regarding our products and services. We shall make sure it is clear when you are able to give us permission to do this, for example, where we send you an online form, there will be clear boxes that you need to tick if you wish to receive any such marketing materials. You have the right to withdraw your consent to receiving direct marketing at any time by contacting us.
- IV. **To administer and protect our business and this website.** We may also use your information in order to protect our business and our website, and to help us monitor or improve the products or services that we offer. This includes troubleshooting, statistical and data analysis, testing, system maintenance, support, reporting and hosting of data. This is necessary for the running of our business, provision of administration and IT services, network security and prevention of fraud. We may also need to use your information in the context of a business reorganisation or group restructuring exercise.
- V. **Other purposes.** We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another lawful reason and that reason is compatible with the original purpose. If you require an

explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

WHEN WILL WE SHARE YOUR PERSONAL DATA

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We shall not share your personal data with any third parties for marketing purposes. We shall however, share your personal data with third parties, for the following reasons:

- I. **Service Providers.** We will share your personal data with service providers where this is necessary in order to provide you with products or services that you have ordered. Examples of Service Providers include payment processors, hosting services, suppliers, sub-contractors and delivery services. We may also need to share your personal data with third party software or IT support providers for the purpose of system administration, data security, data storage, back up, disaster recovery and IT support.
- II. **To transfer your information in the case of a sale, merger, consolidation, liquidation, reorganisation, or acquisition.** We may share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses 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 Policy. III. To protect the rights, property, or safety of our business and other customers. We reserve the right to disclose or share your personal data in order to comply with any legal or regulatory requirements, enforce our terms and conditions (or any other agreement we enter into with you), or to protect the rights, property, or safety of our business and other customers. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. We may also need to share information with HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom, who require reporting of processing activities in certain circumstances. We may also share your personal data with our professional advisers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.

Third Party Websites

This website may include links to third-party websites within our local community, plug-ins and applications. Clicking on those 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. When you leave our website, we encourage you to read the privacy notice of every website that you visit.

International Transfers

We do not transfer your personal data outside the European Economic Area (EEA)

WHERE WILL WE STORE YOUR PERSONAL DATA

All personal data that you provide to us is stored on our secure servers and copied and archived on our behalf by an outsourced IT support company. We use our best endeavours to ensure that your data is treated securely and in accordance with this Policy and comply with the relevant data protection legislation within the United Kingdom. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered 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. Please note that the transmission of information through email via the internet is not completely secure. Although we shall do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us; any transmission is at your own risk. Once we have received your information, we shall use effective safeguarding procedures and security features to try to prevent any unauthorised access to your personal data.

HOW LONG WILL WE KEEP HOLD OF YOUR PERSONAL DATA

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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, and the applicable legal requirements. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. Where you have given us your permission to contact you for marketing purposes, we shall contact you every five years from the date on which you originally gave your permission to ensure that you still wish to be contacted in this way. In some circumstances you can ask us to delete your data: see the “Right to be Forgotten” section below for further information.

YOUR RIGHTS

Under certain circumstances, you have the following rights:

1. **Access Request:** To request that we provide you with a copy of the personal data that we hold about you;
2. **Right to Rectification:** To request that we rectify any personal data that we hold about you;
3. **Right to be Forgotten:** To request that we erase any personal data that we hold about you;

4. **Restriction of Processing:** To restrict the level of processing we carry out with your personal data;
5. **Data Portability:** to obtain from us all personal data that we hold about you in a structured, machine readable form, and have this information transmitted to another organisation;
6. **Right to Object:** to object to our processing your personal data in certain ways; and
7. to withdraw your consent at any time to our processing of your personal data.

Please see the relevant sections below for further details on your rights as a data subject. You can exercise any of the above rights by emailing us at info@cutlerandwoolf.co.uk. You also have the right to lodge a complaint with the Information Commissioner's Office if you are unhappy in any way with how we have treated your personal information. We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office, so please contact us in the first instance.

We shall comply with any request made under this section as soon as possible, and normally within one month from the date of your request. However, if necessary, for example if your request is particularly complex or we receive a number of similar requests, we may extend this period by an additional two months, but we shall notify you if we need to do this. You will not usually have to pay a fee to access your personal data (or to exercise any of your other rights). However, please note that where we receive requests under this section which are manifestly unfounded or excessive, for example because they are repetitive in nature, we may:

1. Charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
2. Refuse to act on the request. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

ACCESS REQUEST

You have the right to request a copy of the information that we hold about you at any time. This enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it. Please note that in most circumstances, we shall not make a charge for this. However, we may charge a reasonable fee based on administrative costs for any further copies requested.

RIGHT TO RECTIFICATION

You have the right at any time to ask us to rectify any personal data that we hold for you which is incorrect or incomplete. This enables you to have corrected any incomplete or inaccurate data we hold about you, though we may need to verify the accuracy of the new data that you provide to us. If we have disclosed any incorrect or incomplete data to any third parties, we shall inform them of any necessary amendments or corrections made to your personal data under this section.

RIGHT TO BE FORGOTTEN

You have the right to ask us to erase the personal data that we hold about you in circumstances where: 1. It is no longer necessary for us to handle your personal data for the purpose for which it was originally collected; 2. You have withdrawn your permission for us to hold your personal data (where this was the basis on which it was collected or used); 3. You object to the processing of the data and there is no lawful overriding reason for us to continue processing your personal data; 4. The personal data was unlawfully processed; or 5. We have to erase your personal data in order to comply with a legal obligation. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

RESTRICTION OF PROCESSING

You can ask us to restrict how we use your data in circumstances where:

1. You believe that the information we hold about you is inaccurate, you can ask that we refrain from using your data until we can verify the accuracy of it;
2. We have unlawfully processed your data, you can ask that we restrict our usage of it rather than erase it completely;
3. We no longer need to hold your information, but you wish us to retain your information for the purpose of establishing, exercising or defending a legal claim; or
4. You have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

DATA PORTABILITY

You have the right to obtain from us all personal data which you have provided to us in a structured, commonly used and machine readable form, provided that such data was processed based on your consent, or for the purpose of a contract between us and the processing was carried out by automated means. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. This will allow you to move, copy or transfer personal data easily from one IT environment to another. Alternatively, we can transmit such data directly to another organisation. Please note that we shall not be able to comply with a data portability request if this will affect the rights and freedoms of others.

RIGHT TO OBJECT

You have the right to object, on grounds relating to your particular situation, to our processing of your personal data where we are doing this for the performance of a task carried out in the public interest (which we shall have told you about, if applicable), or where we are carrying out processing for the purposes of legitimate interests pursued by us. You also have the right at any time to ask us not to process your personal data for direct marketing or profiling purposes (to the extent that such profiling is related to such direct marketing). We shall have informed you before the time we obtained your personal data whether we intend to process your personal data for this purpose, or if we intend to disclose your information to any third party for such purposes. If we process your personal data for automatic decision making or profiling purposes (i.e. to analyse or predict your personal preferences and purchase behaviour, and such profiling is automated) we shall tell you about this beforehand and will only do this where this is a

necessary condition of entering into a contract between you and us, or where you have given us your explicit consent to do this.

RIGHT TO WITHDRAW CONSENT

Where you have given us your consent to our processing of any of your personal data, you have the right to withdraw your consent at any time, for example if you no longer wish us to share your information with third parties for marketing purposes (where you have previously consented to this). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. In addition to any other way we make available to you the ability to withdraw your consent, you may also withdraw your consent at any time by contacting us at info@cutlerandwoolf.co.uk.