

## Privacy Notice

We take your personal information very seriously and are committed to protecting this information and being transparent with how and what we do with it.

We therefore urge you to read this policy carefully because it contains important information about;

- The personal information we collect about you
- What we do with the information
- Who your information may be shared with

## Who we are

Sellelectronics Ltd are a 'data controller' and are responsible for, and control the processing of your personal information. We are required by applicable law to inform you how we process your personal information. This includes;

- The Data Protection Act 1998 (which will be replaced by the EU General Data Protection Regulations (GDPR) from 25<sup>th</sup> May 2018)
- The Privacy and Electronic Communications (EC Directive) Regulations 2003

This privacy notice ("**Notice**") explains how Sellelectronics Ltd ("**we**", "**us**", or "**our**") Company Number 07315156, Church View Business Park, Falmouth, Cornwall, TR11 4FZ, may collect, use, disclose or otherwise process personal data of our customers and suppliers in accordance with the General Data Protection Regulation ("**GDPR**"). This notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

## Personal Data

As used in this notice:

**"Customer"** means an individual who has contacted us through any means to find out more about any goods or services we provide, or may/have, entered into a contract with us for the supply of any goods or services by us.

**"Personal Data"** means data, whether true or not, about a customer who can be identified from that data or from that data and other information to which we have or are likely to have access.

Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name and identification information such as your company account number, contact information such as your address, email address or telephone number, employment information and financial information.

## How and when we will collect information about you

We do not collect your personal data unless it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us. After you (or your authorised representative) have been notified of the purposes for which the data is collected, and you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes or collection and use of personal data without consent is permitted or required by the GDPR or other laws.

We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

Examples of when we collect your information;

- You want to work with us and fill in a job application form
- You send a CV for a job application
- You fill in the 'contact us' form on our website
- When you consent to us sending you marketing materials or surveys
- When a potential customer sends us an enquiry to quote for a job
- When a supplier offers to quote for goods or services
- Acquiring the services of consultants for either design or quality requirements

### **How we will use legitimate interests**

When considering the legal basis for processing customer information under legitimate interest we will check that legitimate interests is the most appropriate basis. We also understand our responsibility to protect the individual's interests. If legitimate interest is deemed necessary for processing information a Sellelectronics Legitimate Interest Assessment will be performed (Sellelectronics GDPR Legitimate Interest Assessment Template GDPR 06).

We may use legitimate interests to process information for the following reasons;

- where processing enable us to enhance , modify or personalise or improve our services/communications for the benefit of our customers
- to improve our network security and IT systems
- to identify and detect fraud
- to determine the effectiveness of our advertising and marketing
- to help us better understand how people use and navigate our website
- Defending claims – sharing CCTV images from our premises with insurers to help identify fraud or for crime prevention purposes.

We may contact you by telephone or email under legitimate interests, however we will not contact you if you are registered with the Telephone Preference Service (TPS) or Mail Preference Service (MPS) unless you have given us permission to contact you via telephone or email by previously provided in opt in consent.

You have the right to object or withdraw us using legitimate interests at any time but please understand that if you object this may affect our ability to carry out the aforementioned task above for your benefit. You can request us to stop communication with you by either email or telephone as detailed below;

[info@sellelectronics.co.uk](mailto:info@sellelectronics.co.uk) or +44(0)1326 450393

### **We may collect and use your personal data for any or all of the following purposes:**

- Performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
- Verifying your identity;
- Responding to, handling, and processing queries, requests, applications, complaints, and feedback from you
- Managing your relationship with us
- Complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by and governmental and/or regulatory authority;
- Any other purposes for which you have provided the information
- Although we will not transmit your data to unaffiliated third parties we may have to transmit to relevant governmental and/or regulatory authorities, whether in the United Kingdom or abroad, for the aforementioned purposes;
- Any other incidental business purposes related to or in connection with the above.

**We may disclose your personal data:**

- Where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you.

The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (i.e. pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

**Your rights**

Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

**Withdrawing Your Consent**

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such a time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our offices at the contact details provided below.

Email: [info@sellelectronics.co.uk](mailto:info@sellelectronics.co.uk)

Sellelectronics Ltd  
Church View Business Park  
Falmouth  
Cornwall  
TR11 4FZ

Upon receipt of your written request to withdraw your consent, we may require reasonable time for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) business days of receiving it, depending on the complexity of the request and its impact on our relationship with you.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request.

**Access To and Correction of Personal Data**

If you wish to make an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our offices at the contact details provided below.

Email: [info@sellelectronics.co.uk](mailto:info@sellelectronics.co.uk)

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We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the GDPR).

### **Protection of Personal Data**

To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risk, we have introduced appropriate administrative, physical and technical measures such as up to date antivirus protection, firewall's and the use of privacy filters via user access controls to secure all storage and transmission of personal data by us, and disclosing personal data internally.

You should be aware, however, that no method of transmission over the internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

### **Accuracy of Personal Data**

We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our offices in writing or via email at the contact details provided below.

Email: [info@sellelectronics.co.uk](mailto:info@sellelectronics.co.uk)

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### **Retention of Personal Data**

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws. Personal information in respect of financial transactions will be for as long as the law requires for tax and accounting purposes which may be up to 6 years.

We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected and is no longer necessary for legal or business purposes.

### **Transfers of Personal Data Outside of the EU**

We generally do not transfer your personal data to countries outside of the European Union (EU)/European Economic Area (EEA). However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the GDPR. However you should be aware that legal protection for personal information outside of the EU/EEA may not be equivalent to the level of protection provided within the EU/EEA.

### **Log files and cookies**

Log files & cookies are maintained and analysed of all requests for files on this website's web servers. Log files & cookies do not capture personal information but do capture the user's IP address, which is automatically recognised by our web servers.



Aggregated analysis of these log files & cookies is used to monitor website usage. These analyses may be made to available to Sellelectronics staff and partner agencies to allow them to measure, for example, overall popularity of the site and typical user paths through the site.

Except as stated already, Sellelectronics will make no attempt to identify individual users. You should be aware, however, that access to web pages will generally create log entries in the systems of your ISP or network service provider. These entities may be in a position to identify the client computer equipment used to access a page. Such monitoring would be done by the provider of network services and is beyond the responsibility or control of Sellelectronics.

Sellelectronics will make no attempt to track or identify individual users, except where there is a reasonable suspicion that unauthorised access to systems is being attempted. In the case of all users, Sellelectronics reserves the right to attempt to identify and track any individual who is reasonably suspected of trying to gain unauthorised access to computer systems or resources operating as part of Sellelectronics web services.

As a condition of use of this site, all users must give permission for Sellelectronics to use its access logs to attempt to track users who are reasonably suspected of gaining, or attempting to gain, unauthorised access.

All log file information collected by Sellelectronics is kept secure and no access to raw log files & cookies is given to any third party.

This website does not store any information that would, on its own, allow us to identify individual users of this service without their permission. Any cookies that may be used by this website are used either solely on a per session basis or to maintain user preferences. Cookies are not shared with any third parties.

#### **How to make a complaint and/or raise a concern.**

If you have any general concerns as to how your data is processed or have any queries regarding this privacy notice you can contact:

Jon Hurrell – Managing Director

Email: [jon@sellelectronics.co.uk](mailto:jon@sellelectronics.co.uk)

Sellelectronics Ltd  
Church View Business Park  
Falmouth  
Cornwall  
TR11 4FZ

Tel: 01326 450393

If you would like to lodge a complaint with regard to how we have processed your personal information please contact Dean Haney in writing, email or telephone via the contact details above.

If you are not satisfied with the response you receive then you have the right to lodge a complaint to the Information Commissioner's Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data. We are registered with the Information Commissioner's Office under number **ZA394508** Please see the contact information below;

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

