



Westica Communications Privacy Policy

Effective as of 25 May 2018

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1. Introduction

At Westica, we want to give you the best possible products and services and to ensure that any information you supply to us is used correctly and stored securely. To do this, we may need to keep your details to enable us to contact you as and when needed. However, your privacy and the security of your personal data is, and will always be, important to us. Therefore, we want to explain how and why we gather, store, share and use your personal data - as well as outline the controls and choices you have around when and how you choose to share your personal data.

2. About this Policy

This Policy sets out the essential details relating to your personal data relationship with Westica Communications. The Policy applies to all Westica Communications services.

From time to time, we may develop new or offer additional services. If the introduction of these new or additional services results in any change to the way we collect or process your personal data we will provide you with more information and additional terms or policies. Unless stated otherwise when we introduce these new or additional services, they will be subject to this Policy.

The aim of this Policy is to:

1. Ensure that you understand what personal data we collect about you, the reasons why we collect and use it, and who we share it with;
2. Explain the way we use the personal data that you share with us in order to give you a great service when you are using Westica Communications; and
3. Explain your rights and choices in relation to the personal data we collect and process about you and how we will protect your privacy.

We hope this helps you to understand our privacy commitments to you. If you ever have any questions or concerns, please email dataprotectionofficer@Westica.co.uk Alternatively, if you do not agree with the content of this Policy, then please remember it is your choice whether you want to use Westica Communications.

3. Your rights and your preferences: Giving you choice and control

You may be aware that a new European Union law, called the General Data Protection Regulation or "GDPR" gives certain rights to individuals in relation to their personal data. Accordingly, we have implemented additional transparency to our systems to ensure we are doing everything we need to.

As available and except as limited under applicable law, the rights afforded to individuals are:

- **Right of Access** - the right to be informed of and request access to the personal data we process about you;
 - **Right to Rectification** - the right to request that we amend or update your personal data where it is inaccurate or incomplete;
 - **Right to Erasure** - the right to request that we delete your personal data;
 - **Right to Restrict** - the right to request that we temporarily or permanently stop processing all or some of your personal data;
 - **Right to Object** -
 - the right, at any time, to object to us processing your personal data on grounds relating to your particular situation;
 - the right to object to your personal data being processed for direct marketing purposes;
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- **Right to Data Portability** - the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another party's service; and
- **Right not to be subject to Automated Decision-making** - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

If we send you electronic marketing messages based on your consent or as otherwise permitted by applicable law, you may, at any time, respectively withdraw such consent or declare your objection ("opt-out") which we will adhere to.

4. How do we collect your personal data?

We collect your personal data in the following ways:

1. **When you become a customer of Westica Communications** - when you become a customer of Westica Communications we collect certain personal data so you can use our services such as your email address, property address or contact name to enable us to provide you with the best service possible.
2. **When you become a supplier to Westica Communications** - when you become a supplier to us we collect certain personal data so you can use our services such as your email address, property address or contact name to make it easy for us to use your services in the future.
3. **Sharing the data, we hold for you** - We only share the data we hold for you with our internal people and the internal people of our partners if they are part of the service we offer. This information will only be used for the purposes of enhancing our service to you. It will not be sold or shared to any other third party.

We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, creating marketing and promotion models, improving our Service, and developing new features and functionality within Westica Communications.

5. What personal data do we collect from you?

We have set out in the tables below the categories of personal data we collect and use about you:

Categories of Data	Description of category
Account Registration Data	This is the personal data that is provided by you or collected by us to enable you to be a customer to us or a supplier for us. This includes your full contact

	details (including but not limited to postal address email address, telephone number(s) and contact names), bank account details, business/company details.
Marketing Data	<p>Communications and our external marketing team to send you marketing communications either:</p> <ul style="list-style-type: none"> • Via email • Via post • Direct from our external marketing team

You can find out more about the personal data collected and the controls you have in relation to the marketing communications you receive via our Data Protection Officer: dataprotectionofficer@westica.co.uk

6. What do we use your personal data for?

When you use or interact with Westica Communications we use a variety of technologies to process the personal data we collect about you for various reasons. We have set out in the table below the reasons why we process your personal data, the associated legal bases we rely upon to legally permit us to process your personal data, and the categories of personal data:

Description of why Westica Communications processes your data	Legal Basis for the processing purpose	Category of personal data used by Westica Communications for the processing purpose
To provide and improve the service we provide to you	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest 	<ul style="list-style-type: none"> • Account registration data
To communicate with you for Westica Communications related services	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest 	<ul style="list-style-type: none"> • Account registration data

<p>To process your payment to prevent or detect fraud including fraudulent payments and fraudulent use of the Westica Communications.</p>	<p>Performance of a Contract Compliance with legal obligations Legitimate Interest</p>	<p>Payment data</p>
<p>To communicate with you, either directly or through our external marketing team, for:</p> <ul style="list-style-type: none"> · marketing, · research, · participation in contests, surveys and sweepstakes, · promotional purposes, <p>via emails, notifications, or other messages, consistent with any permissions you may have communicated to us (e.g., through using our email opt-in/out service)</p>	<p>Consent Legitimate Interest</p>	<p>Contests, Surveys and Sweepstakes Data Marketing Data</p>

7. Sharing your personal data

We have set out the categories of recipients of the personal data collected or generated through your use of the Westica Communications.

Information we may share

<p>Category of Recipient</p>	<p>Reason for sharing</p>
<p>Our external Marketing Department</p>	<p>- To ensure we are offering the best possible service to you</p>

	- To keep you updated with relevant Westica Communications and industry news
External banking and payment processor	- To efficiently make and receive payments

8. Data retention and deletion

We keep your personal data only as long as necessary to provide you with the Westica Communications and for legitimate and essential business purposes, such as maintaining the performance of the Westica Communications services, making data-driven business decisions, complying with our legal obligations, and resolving disputes. We keep some of your personal data for as long as you are a customer or supplier of Westica Communications. For example, account information.

If you request, we will delete or anonymise your personal data so that it no longer identifies you, unless, we are legally allowed or required to maintain certain personal data, including situations such as the following:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute we will retain the necessary personal data until the issue is resolved;
- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.

9. Keeping your personal data safe

We are committed to protecting our users' personal data. We implement appropriate technical and organisational measures to help protect the security of your personal data; however, please note that no system is ever completely secure. We have implemented various policies including, encryption, restricted access, and retention policies to guard against unauthorised access and unnecessary retention of personal data in our systems.

10. Changes to this Privacy Policy

We may occasionally make changes to this Policy.

When we make material changes to this Policy, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by sending you an email. We may notify you in advance.

Please, therefore, make sure you read any such notice carefully.

If you want to find out more about this Policy and how Westica Communications uses your personal data, please contact us using the information below.

11. How to contact us

Thank you for reading our Privacy Policy. If you have any questions about this Policy, please contact our Data Protection Officer by either emailing:

Dataprotectionofficer@westica.co.uk

Or in writing to:

The Data Protection Officer
Westica Communications
5, Dalziel Road
Hillington Park
Glasgow
G52 4NN

Thank you for taking the time to read our policy.
