

We, Cable and Wholesale Supplies Limited (CWS) are committed to protecting your privacy and promise to collect, process and share your data safely and securely when you use The CWS website or services. Our Privacy Policy tells you how we do this and what your rights are. Any personal data processed in line with our Privacy Policy is controlled by us, as the data controller.

Our Privacy Promise

Transparency – We will always tell you what data we’re collecting about you and how we use it. We only share your data with trusted partners and will never sell your data.

Secure – We are committed to always follow industry best practices to ensure your data is stored safely and securely. We protect the confidentiality, accuracy and availability of the information we collect about you.

Control – We will always give you control over the marketing you receive from us. You can choose the types of messages you receive and whether you want to stop receiving marketing communications.

Privacy Policy

Information we collect about you

Personal and contact information when you open a Business Trading account with us (or update that information within your account), including your name, home and/or business address, email address, telephone number(s), title, date of birth, Business Name, Directors names.

Details (and copies) of your communications and interactions with us including by email, post, social media channels or Website www.cwsltd.uk.com

Transaction details including payments from you for our services, payments to you (for example refunds), details of goods and services obtained.

Financial information including your bank account details (which are sent to BACS) when paying for goods by direct debit, and payment card information (which is sent to WorldPay) when you make a purchase online or via the telephone.

How and why we use your personal data

	How we use your personal Data	Why We use your personal data
Registration	We use your personal and contact information to register you as a new customer. We collect financial information if you register payment card information to your account.	Necessary for the performance of a contract with you.
Eligibility	We Credit score Check the personal details you provide at account set up	Necessary for compliance with a legal obligation.

	and, where relevant, any identity documents you have provided to check whether you are eligible to use our services and products.	
Verification	We may require copies of documents to verify your identity where we are required by law to provide assistance or in order to comply with any request you may make regarding CWS account.	Necessary for compliance with a legal obligation.
Managing your account	We use your personal and contact information, financial information, and transaction details about your purchases, to manage your account, to contact you about product deliveries and invoicing.	Necessary for the performance of a contract with you.
Communicating with you	<p>We use the personal and contact information provided by you, copies of your communications with us and, in some circumstances, transaction details, to manage our relationship with you. For example:</p> <ul style="list-style-type: none"> • to notify you about changes to our Account Terms or Privacy Policy; • to communicate with you in response to any query, request or complaint you may have including by email, telephone relating to any products/services that you have purchased from us or otherwise. 	<p>necessary for the performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (Product changes and updates to cost).</p>
Staff training	We use copies of your communications with us to train our staff.	Necessary for our legitimate interests (to ensure that we are able to provide the best service to you).
Technical issues	If you contact us about an issue, we may use technical information, and personal and contact information to administer and protect our business and this website (including	Necessary for our legitimate interests (for running the provision of administration and IT services, security and fraud prevention).

	troubleshooting, testing, system maintenance, support, reporting and hosting of data)	Necessary to comply with a legal obligation.
Fraud prevention	We may use your personal and contact information, financial information, information about any transaction between you and us, in order-to undertake analysis for the purposes of identifying and dealing with any fraud or fraudulent activity.	Necessary to comply with a legal obligation. Necessary for our legitimate interests (to ensure that transactions and interactions with us are not fraudulent).
Queries	We may use your personal and contact information, financial information, information about any transaction between you and us for the purpose-of dealing with any request, complaint or query from you.	Necessary to comply with a legal obligation. Necessary for our legitimate interests (to respond to you and to deal with any request you may have).

How We use your personal data for direct marketing

We may send you marketing communications. You may receive direct marketing by email if you have opened a CWS account and have either consented to receive such email marketing during account registration, and/or have not asked us to stop sending direct marketing by email to you.

How to opt out of direct marketing

You can opt out from receiving direct marketing communications and notifications from us at any time. There are several ways you can do this:

- To stop receiving marketing by email either:
 - o click 'unsubscribe' in any email communication we send you; OR
 - o To stop receiving notifications on your mobile device simply reply via return text 'STOP' and we will stop the communications

How We share your data with third parties

- Banks and payment providers – to set up a debit on your account
- Police or other such regulatory authority – as part of an investigation or otherwise for legal or regulatory purposes.
- Credit reference agencies – for the purpose-of checking the details that you have provided us with are correct and to comply with our regulatory obligations.

How we protect your Personal data

- Our online security controls maintain confidentiality at all-times, specifically for secure card payments. We are certified to the payment card data security standards (PCI-DSS) and never store card details.
- As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where we do, we require that third party to have appropriate technical and organisational measures in place to protect your personal data however, in some instances we may be compelled by law to disclose your personal data to a third party and have limited control over how it is protected by that party.
- Your personal data is kept locked and secured in our head office with access only to the relevant staff and DPO and encrypted
- BitLocker: BitLocker is a full disk encryption. It is designed to protect data by providing encryption for entire volumes. By default, it uses the AES encryption algorithm in cipher block chaining (CBC) or XTS mode with a 128-bit or 256-bit key.

How long we keep your personal data

We will only keep 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.

At the end of that retention period, your data will either be deleted or anonymised (so that it can no longer be associated with you).

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.

Your Rights

You have the right:

- to ask us not to use your personal data for direct marketing. To do so, visit your Email preferences and Personalisation settings within your account or contact our DPO. See further information on how to do this above.
- to ask us not to process your personal data where it is processed on the-basis of legitimate interests, if there are no compelling reasons for that processing;
- to request from us access to personal information held about you (see below);
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask that we stop any consent-based processing of your personal data after you

withdraw that consent;

- to ask, in certain circumstances, to delete the personal data we hold about you;
- to ask, in certain circumstances, for the processing of that information to be restricted; and
- to ask, in certain circumstances, for data portability.

Contact Us

If you have any questions about our Privacy Policy, including any requests to exercise your rights, please contact the **Data Protection Officer** using the details set out below:

By post to:

Data Protection Officer

Cable and Wholesale Supplies Limited
Unit 9 Great Barr Business Park
Baltimore Road
Great Barr
Birmingham
B42 1DY
T: 0121 439 8010
F: 0121 439 8338
Email: sales@cwsLtd.ul.com

Website: www.cwsLtd.uk.com

To request a copy of the personal data that CWS holds about you, please send your request in writing to the Data Protection Officer at the above address. To enable us to verify your identity and process your request, you must include all of the following information and documentation with your request:

- your full name;
- the email address registered to your account;
- a description of the data that you are requesting, including a date range;
- a copy of your current and valid photo ID (e.g. passport photo page);
- proof of your address in the form of a photocopy of a utilities or service provider bill; and
- the date of the request.

If you are unhappy with our processing of your personal data, you have the right to complain to the Information Commissioner's Office (ICO) at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with any concerns before you approach the ICO, so please contact the Data Protection Officer by email in the first instance.