



1. Introduction

AXIS PED Limited takes your privacy extremely seriously. This policy sets out how we collect and process any personal data you may provide to us when you contact us or become a client or supplier. This policy applies where AXIS PED Limited (referred to as “we”, “us” or “our” in this privacy notice) identify as the data controller and where we are responsible for your personal data.

Contacting us

AXIS PED Limited have appointed a Data Protection Manager, who will be responsible for privacy matters and the protection of personal data we hold as an organisation. The Data Protection Manager is:

Name: Phillip Roden

Email address: enquiries@axisped.co.uk

Telephone number: 0844 8700 007

AXIS PED Limited is a limited company registered in England and Wales whose registered number is 3872453 and whose registered office address is Unit 11, Well House Barns, Chester Road, Bretton, Flintshire, CH4 0DH.

Making complaints

If you are unhappy with the way we collect or process your personal information, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO) who are the UK’s supervisory authority for data protection.

Complaints and concerns can be lodged with the ICO here: ico.org.uk/concerns

We kindly ask that before any complaints are lodged with the ICO, you contact us first to try and resolve any issues you may have.

2. What data do we collect?

Personal information we may collect and process from you includes:

- contact information – such as your name, address, telephone number and email address; and any other personal information you may provide to us in the process of us signing you up as a client or supplier.

Sensitive data

Under the General Data Protection Regulation/Data Protection Act 2018, sensitive personal data is data which includes information 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.

AXIS PED Limited does not collect sensitive personal data about you – if we were to require it for any reason, we would seek explicit consent from you to gather this.

3. How do we use your personal data?

We will only use your personal data for the following reasons:

- to provide you with the services we offer as a business;
- to provide you with information you have requested from us;
- to keep you updated on our business, offers and news we may have;
- to manage our relationship with you as an existing or potential client; and
- to fulfil any legal or contractual obligations we may have which require the processing of personal data.

4. How do we obtain your data?

We can collect data about you via a variety of methods:

- from direct actions we may have with you by communicating via phone, email or post; and
- when you provide information to us as part of our sign-up process with you as a client or supplier.

5. Our lawful purposes for collecting and processing your information

We have identified that we will use your information for the following reasons:

- 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;
- in the performance of a contract; and
- to meet a legal requirement.

We do not rely on consent as a lawful purpose for processing personal data, however, were we to do so, you have the right to withdraw consent (where applicable) at any time by emailing us at enquiries@axisped.co.uk

6. Who do we share your information with?

We may need to share your information with third parties in order to provide you with our services or to market to you, these third parties include:

- local authorities and government organisations;
- our clients;
- our suppliers; and
- any other organisation where it is necessary to provide your personal data in order to provide you with our services.

Where we do share your information with third parties, AXIS PED Limited ensures that the highest levels of data protection are in place in accordance with the law. Third parties with whom we share data are only permitted to process this data for the specified purposes we stipulate with them.

We do not sell your information onto third parties.

7. International transfers

Where possible, we ensure that your data is stored within the European Economic Area (EEA), however some of our storage locations and service providers may be hosted outside of the EEA.

When we do need to transfer your personal data out of the EEA, we ensure one of the following safeguards are in place to provide a similar level of security of your data:

- Your personal data has been transferred to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission; or
- The hosting environment we use has specific contracts, codes of conduct or certification mechanisms in-place which have been approved by the European Commission; or
- Where we transfer data to the United States, we ensure our providers are certified as part of the EU-US Privacy Shield programme.

If none of these safeguards are available, we will only transfer your data with your explicit consent, which can be removed at any time by contacting us.

Please email us at enquiries@axisped.co.uk if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. Retention periods

Your personal information will be retained in accordance with our data retention policy which categorises all of the data assets held by us and specifies the appropriate retention period for each data asset.

These periods are based on the requirements to keep the data for as long as necessary to fulfil the purpose for which it was collected, to meet any legal requirements or to satisfy any reporting needs.

Please contact our Data Protection Manager if you would like further information on our retention periods.

9. Your rights

Under the General Data Protection Regulation/Data Protection Act (2018), you have certain rights regarding your personal data, these include the right to:

- request access to your personal data;
 - request correction of your personal data;
 - request erasure of your personal data;
 - object to processing of your personal data;
 - request restriction of processing your personal data;
 - request transfer of your personal data; and
- withdraw consent.

You may exercise any of these rights by raising a subject access request with us. You can do this by contacting our Data Protection Manager.

We will not charge you for making a request and we will make all reasonable efforts to respond to you within 30 days. Sometimes it may take longer than 30 days to gather all the information we

may hold on you, in this situation we will keep you updated at all times.

We may refuse your request or withhold any personal information that you request if there is an overriding legal reason for us to do so.

10. Information security

AXIS PED Limited takes the security of your information extremely seriously. In order to protect your data, we implement a risk-based approach to adopt the strongest organisational and technical controls in order to protect the confidentiality, integrity and availability of your data.

11. Cookies

Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences.
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

me	Purpose	More information
utma	Used to distinguish users and sessions. The cookie is updated every time data is sent to Google Analytics.	Visit www.google.co.uk/analytics
utmb	Used to determine new sessions/visits. The cookie is updated every time data is sent to Google Analytics.	Visit www.google.co.uk/analytics
utmc	This cookie determines whether the user is in a new session/visit.	Visit www.google.co.uk/analytics

utmt	Used to throttle request rate.	Visit www.google.co.uk/analytics
utmz	Stores the traffic source or campaign that explains how the user reached your site.	Visit www.google.co.uk/analytics

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical cookies, performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. To find out more about cookies and how to delete them, please visit www.aboutcookies.org However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts, or utilise all of the functionality, of our site.

12. Changes to this privacy policy

We keep this policy under regular review. This policy was last reviewed on 27 November 2020. Any questions about this policy can be directed to our Data Protection Manager.