

Privacy Policy

Introduction

JC Watson Mechanical Ltd (JC Watson) a company incorporated in England and Wales under number 09828997 whose registered office is at Coopers House, 56a Wingletye Lane, Hornchurch, Essex, RM11 3AT, understands that your privacy is important to you and that you care about how your personal data is used.

The following principles underpin our approach to respecting your privacy:

- We respect and value the trust that you place in us by giving us your personal information. We will always use your personal information in a way that is fair and worthy of that trust;
- We will provide clear information about how we use your personal information. We shall always be transparent with you about what information we collect, what we do with it, with whom we share it and who you should contact if you have any concerns;
- We will take all reasonable steps to protect your information from misuse and keep it secure; and
- We will comply with all applicable data protection laws and regulations and we will co-operate with data protection authorities. In the absence of data protection legislation, we will act in accordance with generally accepted principles governing data protection.
- This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “**GDPR**”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified.

Personal data typically includes information such as your name, address, screen name, profile picture, email address, and telephone number, but can also include other information such as IP address, shopping habits, information about your lifestyle or preferences such as your hobbies and interests.

The personal data that we collect and use is set out in this Privacy Notice.

What are Your Rights under GDPR?

Under the GDPR, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more;
- the right to access the personal data we hold about you;
- the right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete;

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- the right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have;
- the right to restrict (i.e. prevent) the processing of your personal data;
- the right to object to us using your personal data for a specific purpose or purposes;
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases; and
- Rights relating to automated decision-making and profiling.
- For more information about our use of your personal data or exercising your rights as outlined above, please contact us.

Further information about your rights can also be obtained from the Information Commissioner's Office (<https://ico.org.uk/>) or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/>).

What Personal Data is collected?

The personal data collect may vary according to your relationship with us.

We may collect personal information about you from different sources, including:

Information from you directly when you provide us with personal information, e.g. when you register for prize draws or competitions, sign up to receive information, use applications, buy a product or service from us, fill out a survey, or make a comment or enquiry. The types of information we may collect from you directly include your:

- Name;
- Address;
- email address;
- user name;
- telephone number;
- credit card or other payment information;
- age;
- date of birth;
- user-generated content, posts and other content you submit to J C Watson Ltd Sites; and
- Any other personal information you voluntarily provide to us, such as your hobbies and interests.

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- From cookies and other tools (such as web analytic tools and pixel tags) to automatically collect information about you when you use J C Watson Ltd Sites, subject to the terms of this Privacy Notice and applicable data laws and regulations. The types of information collected automatically may include:
- information about the type of browser you use;
- details of the web pages you have viewed;
- your IP address;
- the hyperlinks you have clicked; and
- your user name, profile picture, gender, networks and any other information you choose to share when using Third Party Sites (such as when you use the “Like” functionality on Facebook or the +1 functionality on Google+)
- The websites you visited before arriving at a J C Watson Ltd Site

We may receive personal information about you from other legitimate sources, including information from commercially available sources, such as public databases and data aggregators, and information from third parties. The types of personal information that we may collect from such sources include your:

- Name;
- street address;
- age;
- your shopping habits;
- preferences and information about your lifestyle such as your hobbies and interests; and
- publicly available information such as user-generated content, blogs and postings, as permitted by law

How is Your Personal Data protected?

We take all reasonable precautions to keep your personal information secure and require any third parties that handle or process your personal information for us to do the same. Access to your personal information is restricted to prevent unauthorised access, modification or misuse and is only permitted among our employees and agents on a need-to-know basis.

We will store your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein.

This means that your personal data will be fully protected under the GDPR or to equivalent standards by law and as outlined in our Data Protection Policy.

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How long is Your Personal Data Kept for?

We will not keep your personal data for any longer than is necessary in light of the reasons for which it was first collected.

Your personal data will therefore be kept for the periods outlined in our Data Retention Policy.

How is Your Personal Data Securely Disposed of?

We dispose of all physical and digital data securely and appropriately depending on its sensitivity.

Your personal data will therefore be disposed of as outlined in our Data Disposal Policy.

How is Your Personal Data used?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account;
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you;
- Personalising and tailoring our products and services for you;
- Communicating with you. This may include responding to emails or calls from you;
- Supplying you with information by email or post that you have opted-in to you may unsubscribe or opt-out at any time by contacting us and
- To comply with any applicable legal requirements.

With your permission and where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, mobile message or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam.

We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Is Your Personal Information Shared?

We may share your personal data with other companies in our group for the purpose of providing products and services outlined in the Privacy Notice. This includes subsidiaries and our holding company and its subsidiaries.

We may share your personal information with J C Watson Ltd Group companies and trusted third parties based outside the country in which you live so that they may process that data on our behalf.

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We may also share your personal information with companies, organisations or individuals outside of the J C Watson Ltd Group if we believe that disclosure of the information is necessary for legal reasons.

We may sometimes contract with the third parties to supply products and services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in this Privacy Notice.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Transferring Personal Information

We may transfer your personal information to servers located outside the country in which you live or to affiliates or other trusted third parties based in other countries so that they may process personal information on our behalf.

You should be aware that many countries do not afford the same legal protection to personal information as you might enjoy in your country of origin.

While your personal information is in another country, it may be accessed by the courts, law enforcement and national security authorities in that country in accordance with its laws. Subject to such lawful access requests, we promise that anyone processing your personal information outside your country of origin is required to implement measures to protect it and is only entitled to process it in accordance with J C Watson Ltd's instructions.

If we share your data with external third parties, that are based outside of the EEA. The following safeguards are applied to such transfers:

- We will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the European Commission.
- Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the European Commission.

Please contact us for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

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The security of your personal data is essential to us, and to protect your data, we take a number of important measures outline in our Data Protection Policy. Please contact us for further information.

By using a J C Watson Ltd Site or otherwise providing J C Watson Ltd with personal information, you agree to us doing so in accordance with the terms of this Privacy Notice and applicable data protection laws and regulations.

Online Advertising

We may share Site Usage Information with trusted third parties (e.g. advertisers, advertising agencies, advertising networks, data exchanges, etc.) in order to offer you tailored content, including more relevant advertising for products and services which may be of interest to you. These third parties may set and access their own cookies, web beacons and similar tracking technologies on your device in order to help us deliver customized content and advertising to you when you visit J C Watson Ltd Sites or Third Party Sites.

In some countries, we have adopted the use of industry-recognised icons (e.g. the AdChoices icon) which may appear alongside targeted advertisements that we (or a service provider acting on our behalf) send to you based on your Site Usage Information. You may click on these icons to receive more information about the collection and use of your information or to opt-out of such collection in future. Please note that even if you opt out, you may still receive advertisements from J C Watson Ltd that are not customized based on your Site Usage Information.

Depending on your location, there may be other solutions to help you control your online behavioural advertising preferences (such as whether certain third parties may collect and use your Site Usage Information for targeted advertising purposes). For example, in Europe the website www.youronlinechoices.com allows you to choose which companies can deliver customized ads while in the US you may use the Network Advertising Initiative's Opt-Out Tool and the Digital Advertising Alliance's Opt-Out Tool.

Mobile Message Services

We may make available a service through which you can receive text or other types of messages on your mobile device ("Mobile Message Service") from J C Watson Ltd such as:

- SMS (short message service);
- MMS (multimedia message service); or
- EMS (enhanced message service).
- If you subscribe to one of our Mobile Message Services, you agree to receive such messages from J C Watson Ltd at the address or mobile number you provide for that purpose, unless and until you have elected to opt out of receiving such messages.

You understand that your mobile carrier's standard rates apply to these messages, and that you may change your mind at any time by following the instructions in this Privacy Notice.

You represent that you are the owner or authorised user of the mobile device you use to sign up for the Mobile Message Service, and that you are authorised to approve the applicable charges.

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In addition to meeting certain age restrictions and any other terms and conditions associated with each Mobile Message Service, you may be required to register personal information such as:

- your name;
- IEMI (International Mobile Station Equipment Identity); or
- Mobile phone number.

We may also obtain the date, time and content of your messages in the course of your use of the Mobile Message Service.

We will use the information we obtain in connection with our Mobile Message Service in accordance with this Privacy Notice.

Your mobile carrier and other service providers may also collect data about your mobile device usage, and their practices are governed by their own policies.

You acknowledge and agree that the Mobile Message Service is:

- Provided via mobile systems which use radios (and other means) to transmit communications over complex networks;
- We do not guarantee that your use of the Mobile Message Service will be private or secure;
- We are not liable to you for any lack of privacy or security you may experience; and
- You are fully responsible for taking precautions and providing security measures best suited for your situation and intended use of the Mobile Message Service.

Your Consent

By using J C Watson Ltd, you are consenting to the collecting, using and disclosing of your personal information in accordance with this Privacy Notice.

If you do not agree to the collection, use and disclosure of your personal information in this way, please do not use the J C Watson Ltd Sites or otherwise provide the relevant J C Watson Ltd Group company with your personal information.

J C Watson Ltd will only collect, use or disclose your personal information where it is fair and lawful to do so. In most cases, we will ask for your consent explicitly but, in some cases, we may infer consent from your actions and behaviour.

We may ask you to provide additional consent if we need to use your personal information for purposes not covered by this Privacy Notice. You are not obliged to provide such consent but if you decide not to then your participation in certain activities may be restricted.

If you provide additional consent, the terms of that consent shall prevail in the event of any conflict with the terms of this Privacy Notice.

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Please note, however, that we may process your personal information without consent if we have a legitimate reason to do so, provided that such use will not have a prejudicial effect on your own rights, freedoms and interests. Any such use shall be in accordance with the J C Watson Ltd Privacy Principles set out above.

Contact Us

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the postal addresses shown below.

To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible. The Subject Access Request Form is available via email upon request.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’, for example, if you make repetitive requests, a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within two weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time.

In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

- Email address dpo@jcwatson.co.uk; or
- Postal Address: Unit 38, Thurrock Commercial Centre, Purfleet Industrial Park, Aveley, RM15 4YA.

Changes to This Privacy Notice

We may change this Privacy Policy from time to time by posting the updated version of the Privacy Policy on the J C Watson Ltd Sites.

We will give you reasonable notice of any material change. We encourage you to visit frequently to stay informed about how we use your personal information.



Signature

Date - 04/01/2021

Position - Managing Director

The Privacy Policy is reviewed on a periodic basis.