

# Privacy Policy

---

## Introduction

Complete Business Solutions take your individual privacy very seriously. This policy sets out the following:

What personal data we collect and process about you in connection with your relationship with us as a customer and through your use of our website, mobile applications and online services;

- Where we obtain the data from.
- What we do with your data.
- How we store your data.
- Who we transfer/disclose that data to.
- How we deal with your data protection rights.
- How we comply with the General Data Protection Regulation.
- The transparency and purpose of information held.
- Minimisation of the data held.

## Data Controller

Complete Business Solutions (referred to as “we”, “us”, “our” or “Complete” in this policy) in this policy primarily refers to Complete Business Solutions Group Ltd where appropriate.

Complete Business Solutions is the “data controller” of all personal information that is collected and processed regarding our customers for the purposes of the General Data Protection Rules effective 25<sup>th</sup> May 2018. Complete is registered in England with the head office being registered at Unit 4, Daughters Court, Silkwood Park, Ossett, Wakefield, WF5 9TQ.

## Personal Information we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, payment details and information about your access to our website.

We may collect personal data from you when you order goods from us, open an account or participate in a survey or competition, or when you contact us.

Specifically, we may collect the following categories of information:

- a) Name, business address, e-mail address, telephone number, credit/debit card or other payment details.
- b) Information about your use of our website.
- c) The communications you exchange with us or direct to us via letters, emails, chat service, calls, and social media.
- d) Location, including your IP address, to prevent fraud.

**Your data may be used for the following purposes:**

- a) Providing products and services you request: we use the information you give us to perform the services you have asked for in relation to your order and account;
- b) Contacting you in the event of a change or overdue order: we send you communications about the services you have asked for and any changes to such services. These communications are not made for marketing purposes and cannot be opted-out of;
- c) Credit or other payment card verification/screening: we use your payment information for accounting, billing and audit purposes and to detect and / or prevent any fraudulent activities;
- d) Administrative or legal purposes: we use your data for statistical analysis, systems testing, customer surveys, maintenance and development, or in order to deal with a dispute or claim. Note that we may profile data based on the account, not the individual. Any profiling of the account is to service you better and does not use personal information. Any personal data that you explicitly agree to us using may be used to perform these activities in accordance with this Privacy Policy;
- e) Security, health, administrative, crime prevention/detection: if requested to do so, we may pass your information to government authorities or enforcement bodies for compliance with legal requirements;
- f) Customer services communications: we use your data to manage our relationship with you as our customer and to improve our services and enhance your experience with us;
- g) Provide tailored services: we use your data to provide information we believe is of interest to you, prior to, during, and after your transaction with us;
- h) Marketing: from time to time we will contact you with information regarding special promotions and products via e-communications. You will have the choice to opt in or opt out of receiving such communications by indicating your choice when you open an account or by using our website. You will also be given the opportunity on every e-communication that we send you to indicate that you no longer wish to receive our direct marketing material.

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected your personal data and why we need to use it.

In most cases we will need to process your personal data so that we can enter into our contract of providing services to you.

**We may also process your personal data for one or more of the following:**

- To comply with a legal obligation (e.g. customs requirements for European shipping);
- You have consented to us using your personal data (e.g. for marketing related uses);
- To protect your vital interests or those of another person (e.g. in case of a medical emergency);
- It is in our legitimate interests in operating as a supplier (e.g. for administrative purposes).

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

We must also consider periods for which we might need to retain personal data in order to meet our legal obligations (e.g. for tax purposes) or to deal with complaints, queries and to protect our legal rights in the event of a claim being made. For retention of information on your account, please see the below section. We may need to hold your data for the duration of the account plus seven years due to legal compliance but will minimise the amount of personal information we store should an account close.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

Source (PII) Client	Process	Principle	Purpose	Retention	Location / Data Processor
Email	Processing	Legitimate Interests	To ensure Order confirmations are sent to client and to send any queries	Terms of Account + 7 Years	UK Own Instance Server
Email & Telephone	Storage	Legal Obligation	To email Client Invoices and Statements, Legal Tax, VAT Compliance and Financial Accounting	Terms of Account + 7 Years	UK Own Instance Server
Email & Telephone	Processing (telephone)	Contractual	To Contact Client to Chase Debt or Apply Credit	Terms of Account + 7 Years	UK Own Instance Server
Name of Contact	Processing	Legitimate Interests / Contractual	To fulfil a Contractual Obligation and ensure Data is sent to the Correct Client	Terms of Account + 7 Years	UK Own Instance Server
Company Name	Processing	Legal Obligation	To Fulfil a Legal Obligation of accounting for UK Tax purposes	Terms of Account + 7 Years	UK Own Instance Server
Company Address	Processing	Legal Obligation	To Fulfil a Legal Obligation of accounting for UK Tax purposes	Terms of Account + 7 Years	UK Own Instance Server
Contact Position	Processing	Legitimate Interests	To fulfil a Contractual Obligation and speak to the Correct person in case of an Account query	Terms of Account	UK Own Instance Server
Purchase History	Storage	Legal Obligation	To handle Customer queries should they request an item from their History and for UK Tax Purposes	Terms of Account + 7 Years	UK Own Instance Server
Cost Centre Selected	Storage	Legitimate Interests	To Comply with Business Reporting Requests from Client (linked to Invoice)	Terms of Account + 7 Years	UK Own Instance Server
<b>Personal Electronic Data</b>					
Cookie	Processing	Legitimate Interests	To allow Checkout Process – Online Web Ordering	24 Hours	UK Own Instance Server
Privacy Policy	Storage	Legitimate Interests	To Disclose and be open, regarding the Business Privacy Policies to Clients	12 Months	UK Own Instance Server
IP Address	Processing / Storage	Legitimate Interests	To ensure Fraud is low Risk for our Clients	3 Months	UK Own Instance Server

**Security**

We follow strict security procedures in the storage and disclosure of your personal data, to protect it against accidental loss, destruction or damage. The data you provide to us is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information so that they can be securely transferred over the internet.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with English and EU law on GDPR and e-privacy.

### **Sharing your personal data**

Your personal data may be shared with other companies within the Complete group.

We may also share your personal data with the following third parties for the purpose described in this Privacy Policy:

- a) Government authorities, law enforcement bodies, regulators for compliance with legal requirements;
- b) Credit agencies to ensure that we apply the appropriate level of risk to your account for compliance with contractual requirements;
- c) Supply chain partners to deliver the services you have asked for, such as shipping direct from our supply chain to ensure you receive your goods, logistical partners, financial houses for internal auditing;
- d) Credit and debit card companies which facilitate your payments to us, and anti-fraud screening, which may need information about your method of payment and order to process payment or ensure the security of your payment transaction;
- e) Legal and other professional advisers, law courts and law enforcement bodies in all countries we operate, to enforce our legal rights in relation to our contract with you;
- f) Social media: You may be able to access third party social media services through our website or App or before coming to our website or App. When you are registered with your social service account, we will obtain the personal information you choose to share with us through these social media services pursuant to their privacy settings to improve and personalise your use of our website or App. We may also use social media plugins on our website or App. Due to this, your information will be shared with your social media provider and possibly presented on your social media profile to be shared with others in your network. Please refer to the privacy policy of these third-party social media providers to find out more about these practices.

All data collected upon registration will be processed in line with this privacy policy and comply with the GDPR effective May 25<sup>th</sup> 2018.

We understand the importance of taking extra precautions to protect the privacy and safety of children. Accordingly, children under 16 will not be permitted to open a Complete account. We will delete any account created by a child under 16 as soon as are made aware of it.

You will have the option to have your password remembered in your web browser, by checking the “keep me logged in” box. This option will only apply to the computer / device and the browser that you're using when you select the box. If you do not wish to stay signed in on a particular browser, simply sign out of Complete online on that browser.

When our use of your personal data is based on your consent, you have the option to withdraw your consent to our processing and delete your personal data at any time by exercising your rights under GDPR.

For business to business transactions, we use anonymised account data for gap analysis where a business may have not purchased a component that we provide in our contractual services. We do not profile personal data, this is only used for account level profiling with no personal data. This is for legitimate business reasons to ensure that our clients receive the best possible service.

We keep your personal information contained in your account for as long as you hold the account as identified in the above retention policy. Please note that general retention periods apply to any personal data we collected to enter into a contract with you, to perform that contract, or because we have a legal obligation to process it.

### **Cookies**

Our websites use cookies to enable us to provide service to you. This may include cookies of media and advertising partners that are being placed on your machine when visiting our website or App. Please visit our partners’ websites for information on their privacy and cookie policy.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable us to recognise your browser and help us to track your order on our site; allowing us to understand better the products and services that will be most suitable to you. A cookie contains your contact information and information to allow us to identify your computer when you travel around our site for the purpose of helping you complete your order. Most web browsers automatically accept cookies but, if you wish, you can change these browser settings by accepting, rejecting and deleting cookies. The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to change these settings, you may find that certain functions and features will not work as intended. The cookies we use do not detect any information stored on your computers.

For more information about cookies and how to stop cookies being installed visit the following website:  
<http://www.allaboutcookies.org>.

### Data Protection Officer

We have appointed a Data Protection Officer (“DPO”) to oversee compliance with this policy. You have the right to make a complaint at any time to a supervisory authority. The ICO, Data Protection Commissioner, is the lead data protection supervisory authority for Complete as a British data controller.

### Under certain circumstances, by law you have the right to:

- Request information about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- Request access to your personal information (commonly known as a "subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information that we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Object to automated decision-making including profiling, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request transfer of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- Withdraw consent. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you wish to exercise any of these rights by requesting a **subject access request** please contact the compliance team below with the nature of the information you require. Please be specific on your request.

Unfortunately, we are unable to provide emails, unless legally obliged to, due to emails containing information on other data subjects which could impact their vital interests and their rights and freedoms as an individual.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**Changes to Privacy Policy**

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an e-mail or a notice on our website.

**Controller Contact Details:**

FAO: GDPR Compliance Team

Complete Business Solutions, Unit 4 Daughters Court, Silkwood Park, Ossett, Wakefield, WF5 9TQ

Tel: 01924 908 996

Email [GDPR@complete.co.uk](mailto:GDPR@complete.co.uk)



**Leigh Everington**  
Managing Director