



WESTERN
PENSION SOLUTIONS

PRIVACY NOTICE

At Western Pension Solutions, we take your privacy very seriously and we ask you to read our Privacy Notice before providing us with any personal data. This document explains how we collect, store and handle your personal data.

1 WHO ARE WE?

This is the Privacy Notice of Western Pension Solutions (a trading name of Vestey Holdings Limited (“**Vestey**”)), a private company registered in England and Wales with the company number (00066076). Our registered office is at 29 Ullswater Crescent, Coulsdon, Surrey, CR5 2HR.

Vestey have a number of operating subsidiary companies (“**Group Companies**”) with which Vestey will occasionally share personal data, as detailed in this Privacy notice.

If you have any questions about how we look after your personal data, you can contact us:

- By email to this address: general@vestey.com
- By telephone on 020 8655 6920

For the purposes of relevant data protection legislation, we are a controller of your personal data and as a controller we use the personal data we hold about you in accordance with this Privacy Notice.

2 THE PERSONAL DATA WE COLLECT

When you contact Vestey via our website, by email, over the telephone or by post, we collect personal data about you to enable us to effectively answer your enquiry or provide you with a service. This personal data includes:

- Your Name
- Your Address
- Company Details (if relevant)
- Your Phone Number
- Your Email Address

3 THE SOURCES FROM WHICH WE OBTAIN YOUR PERSONAL DATA

We obtain your personal data from the following sources:

- (a) Directly from you, either in person (at our locations or otherwise), via our website or by telephone or email. This could include personal data which you provide when you:
 - place an order for our services; or
 - request information on our products or services.



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- (b) Cookies, server logs and other similar technologies. We may automatically collect Information Technology Data about your equipment, browsing actions and patterns by using cookies, server logs and other similar technologies. If you have any questions about our use of cookies, see our Cookies Policy on our website or you can contact us at general@vestey.com;
- (c) publicly available sources, such as:
 - Companies House; and
 - HM Land Registry.
- (d) Our operating subsidiary companies and Group Companies.

4 HOW WE USE YOUR PERSONAL DATA

We collect personal data about you in order to:

- (a) perform our contractual obligations to you. This would include:
 - processing and performing any bookings and order placed by you;
 - orders placed by us where you are a supplier;
 - making or receiving payments, fees and charges; and
 - collecting and recovering money owed.
- (b) use your personal data for health and safety requirements;
- (c) use your personal data in an official role which we have been designated to carry out by an official authority (e.g. the government) or where we are otherwise carrying out tasks which are in the public interest (e.g. which have been designated as such by government, or which would otherwise be deemed in the public interest);
- (d) manage our relationship with you including:
 - to send you important notices such as communications about changes to our terms and conditions and policies (including this Privacy Notice);
 - to provide you with important real-time information about services we provide; and
 - to send you information you have requested; and
 - to deal with your enquiries.
- (e) administer our business and carry out business activities;
- (f) protect our business including to deal with any misuse of our website and to comply with our security policies at our locations;
- (g) to detect and prevent fraud and other illegal activities (and to assist regulators, trade bodies and law enforcement agencies in relation to the same);
- (h) make suggestions and recommendations to you about goods or services that may be of interest to you;



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- (i) sell, make ready for sale, financing or dispose of our business in whole or in part including to any potential buyer or their advisers;
- (j) enforce or apply our terms of use, terms and conditions of supply and other agreements with third parties;
- (k) use our knowledge of any health-related personal data you disclose to us in the event of illness or injury or some other related emergency or to record any accident or injury or other incident you may suffer when visiting any of our locations; or
- (l) investigate and defend any third-party claims or allegations.

5 OUR LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA

Where we may rely on consent

For certain purposes it may be appropriate for us to obtain your prior consent. The legal basis of consent is only used by us in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way.

In the event that we rely on your consent, you may at any time withdraw the specific consent you give to our processing your personal data. Please contact us using the contact details set out in paragraph 1 to do so. Please note even if you withdraw consent for us to use your personal data for a particular purpose we may continue to rely on other bases to process your personal data for other purposes.

Other legal basis

Where we are relying on a basis other than your consent, the lawful basis for processing personal data will be one of the following:

- (a) the processing is necessary in order for us to comply with our legal obligations (such as compliance with anti-money laundering legislation);
- (b) the processing is necessary for the performance of a contract you are party to or in order to take steps at your request prior to you entering into a contract;
- (c) processing is necessary for the establishment, exercise or defence of legal claims; or
- (d) the processing is necessary for the pursuit of our legitimate business interests (including that of the delivery and the promotion of our services).



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In particular, our legitimate interests include:

- (a) the provision of services;
- (b) the recovery of debt;
- (c) the provision of administration and / or IT services;
- (d) the security of the Vestey network;
- (e) the prevention of fraud;
- (f) marketing of services
- (g) the reorganisation or sale or refinancing of the business or a group restructure;
- (h) the study in how to develop and the update of our services; and
- (i) the development of our business strategy.

6 WHO RECEIVES YOUR PERSONAL DATA

We may disclose your personal data to:

- (a) our Group Companies and affiliates or third party data processors who may process data on our behalf to enable us to carry out our usual business practices. Any such disclosure will only be so that we can process your personal data for the purposes set out in this Privacy Notice;
- (b) external professional advisers such as accountants, bankers, insurers, auditors and lawyers;
- (c) HMRC or other tax authorities, legal and other regulators or authorities (e.g. the Information Commissioners Office), including those who request your personal data or to report any potential or actual breach of applicable law or regulation;
- (d) law enforcement agencies (e.g. the police or the Serious Fraud Office), courts or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights;
- (e) third parties where necessary for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties; or
- (f) third parties which are considering or have decided to acquire some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation).



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7 WHEN MIGHT WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA?

If we believe that your enquiry will be best served or answered by a one of our Group Companies we will pass your personal data on to them. As some of these Group Companies are located in countries outside the European Economic Area (EEA) it is possible that personal data we collect from you may be transferred, stored and/or processed outside the European Economic Area, including Dubai, China or the USA.

In connection with such transfers we will ensure that:

- (a) there are appropriate safeguards in place pursuant to Article 46 (or English law equivalent) GDPR such as binding corporate rules or the model approved contractual clauses between us and the recipient; or
- (b) the transfer is one approved by the European Commission as providing adequate protection envisaged by Article 45 GDPR (or English law equivalent) such as to a country approved by the European Commission or privacy shield; or
- (c) one of the derogations for specific situations in Article 49 GDPR (or English law equivalent) applies to the transfer including explicit consent or necessary for the performance of a contract or exercise or defence of legal claims.

8 RETENTION

We will store your personal data for the time period which is appropriate in accordance with the following criteria:

- (a) the on-going business operation / relationship that we have with you;
- (b) the completion of the purpose for which the personal data was given;
- (c) our legal obligations in relation to that data and other legal requirements;
- (d) the type and size of the data held and whether any if it is deemed special data; or
- (e) Vestey's accounting requirements in relation to that data.

We keep the length of time that we hold your personal data for under review. These reviews take place periodically.

9 CONTRACTUAL OR STATUTORY REQUIREMENTS ON YOU TO PROVIDE PERSONAL DATA

In certain circumstances the provision of personal data by you is a requirement to comply with the law or a contract, or necessary to enter into a contract.

If you do not provide your personal data then the consequences of failing to provide your personal data are that we may not be able to perform to the level you expect under our contract with you.



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10 YOUR RIGHTS

If, for any reason, you are unsure about the personal data we are holding in your name, please contact us. We will happily review your details and update the records if required. You can contact us by email, phone or letter.

You have a number of rights under data protection laws; these are summarised below.

- (a) the right to request access to your personal data that we process or control;
- (b) the right to request rectification of any inaccuracies in your personal data or, taking into account the purposes of our processing, to request that incomplete data is completed;
- (c) the right to request, on legitimate grounds as specified in law:
 - erasure of your personal data that we process or control; or
 - restriction of processing of your personal data that we process or control;
- (d) the right to object, on legitimate grounds as specified in law, to the processing of your personal data;
- (e) the right to receive your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller, to the extent applicable in law; and
- (f) The right to lodge complaints regarding the processing of your personal data with the Information Commissioner's Office or other relevant supervisory body. Please see <https://ico.org.uk/concerns/> for how to do this.

If you would like to exercise any of the rights set out above, please contact us using the contact details set out in paragraph 1.

11 CHANGES TO THIS PRIVACY POLICY

We regularly review our privacy policy. Any changes to our privacy policy will be posted on this site so that you may ensure that you are fully informed of your rights and can notify us of any changes to your preferences.

12 LINKS TO OTHER WEBSITES

This policy only applies to us. If you link to another website from our website, you should remember to read and understand that website's privacy policy as well. We do not control unconnected third-party websites and are not responsible for any use of your personal data that is made by unconnected third-party websites.