



GDPR Privacy Notice for Customers and Suppliers

Purpose

Aquascot Ltd ('Aquascot' 'we' 'us') is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all Aquascot customers and suppliers and their employees and representatives ('you').

Aquascot is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former customers and suppliers and their employees and representatives. This notice does not form part of any contract including a contract to provide services, and we may update this notice at any time.

It is important that you read this notice, together with any other privacy information and/or notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

We have appointed a Data Privacy Manager who is responsible for overseeing any privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Privacy Manager using the details set out below.

Full name of legal entity: Aquascot Limited

Data Privacy Manager: Stacey McFarlane

Email address: privacy@aquascot.com

Postal address: Unit 14 Fyrish Way, Teaninich Industrial Estate, Alness, IV17 0PJ

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us in the first instance if you have a complaint so that we can try to resolve it for you.

Data protection principles

We shall comply with data protection law, most notably the General Data Protection Regulations (GDPR). This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.



What data do we collect about you?

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

1. **Identity Data** may include your first name, maiden name, last name, title, gender, date of birth, and job title.
2. **Contact Data** may include your personal or business name and billing address, delivery address, site addresses, email address and telephone numbers.
3. **Financial Data** may include your personal or business VAT number, bank account and payment details.
4. **Transaction Data** may include details about payments between us and other details of purchases made by you.
5. **Profile Data** may include your purchases or orders, your preferences, feedback and survey responses, and geographical regions.
6. **Usage Data** may include information about how you use our website, products and services.
7. **Communications Data** may include your preferences in receiving communications from us, including any contact you make with us through our website and the information you provide.

Sensitive data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, or information about your health and genetic and/or biometric data. We do not collect any information about criminal convictions and offences.

We require your explicit consent for processing any such sensitive data, so when you submit any such details, we shall send you a further communication asking for you to confirm your consent to this processing.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we shall notify you at the time.

How we collect your personal data

We collect data about you through a variety of different methods including:

1. **Direct interactions:** You may provide data by filling in forms at our company site (or otherwise) or by communicating with us by post, phone, email, website or otherwise, including but not limited to when you:
 - order our products or services or vice versa;
 - request resources be sent to you;
 - complete a survey, new supplier form, or participate in any of our auditing processes; or
 - give us feedback.
2. **Automated technologies or interactions:** When you use our website, we may collect data about you through interactions such as our contact us section and/or vacancies section. We do not collect data by using cookies, server logs or similar technologies.
3. **Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register based inside the EU.

How we use your personal data

We shall only use your personal data when legally permitted. The most common uses of your personal data are:



- Where we need to perform the contract between us.
- 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.
- Where we need to comply with a legal or regulatory obligation.

How we process your personal information and our lawful basis for doing so are set out below, including but not limited to:

- We may process names, job titles and business contact information including addresses, telephone numbers and email addresses for your employees and representatives and other information that you provide to us to maintain and manage our relationship with you. Such processing is necessary for the performance of the contract between us.
- Where you are an employee or representative of one of our customers or suppliers, we process this information for the legitimate interest of performing our contract with your employer/company.
- We may perform due diligence in the form of credit checks on companies. We do this to comply with our legal obligations, and as necessary for our legitimate interests of checking that the entities we contract with are financially viable and would not cause us reputational damage.
- Regardless of the relationship we have with you, we may need to use your personal information for legal reasons such as fraud prevention and to check that you are complying with our terms and conditions and to enforce our legal rights.
- We may process your personal information without your knowledge or consent where this is required or permitted by law.
- We may contact you about our products and services but only where we are allowed to under Data Protection Law. If you tell us that you do not want to be contacted for any of these purposes, then we will of course respect that. Sometimes we will need your consent before contacting you for these reasons.

Do we need your consent?

In very limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data, if necessary. If we do so, we shall provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Change of purpose

We shall only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we shall notify you and we shall explain the legal basis which allows us to do so.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we shall notify you and we shall explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in our group. We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?



We shall share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. We shall also do so if we have a legal obligation to do so or for the purposes of fraud protection and credit risk reduction.

Which third-party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: service provision and administration, IT services, training, and professional advice. At the date of this privacy notice, the following third-party service providers process personal information about you for the following purposes:

SERVICE	PROVIDER
Financial Reporting, Processing and Administration	HMRC, Ritsons, Sage, TMS (Thom Micro Systems)
IT Services	sfG Software, Emydex
Record and Compliance Monitoring	Office of National Statistics
Car Hire	Enterprise rent-a-car
Insurances	Arthur J Gallagher
Ethical Compliance Auditing	Intertek, Sedex
Health & Safety Advice and Guidance	SPW Management Solutions
BRC Compliance Auditing	SAI Global
The Implementation of Responsible Practices throughout our Supply Chain.	Waitrose Farming Partnership
Compliance Monitoring	John Lewis Partnership Master Data Management Supplier Portal, Waitrose Engage, Waitrose Product Pathway (WPP), Sedex, Authenticate

This list is not exhaustive and should an alternative third party be used it would be for the provision of services list above.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We shall share your personal information with other entities in our group where necessary as part of our business activities and service provision, for the use of the services you offer, or in the context of a business reorganisation or group restructuring exercise.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties shall only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those partners, agents, contractors and other third parties who have a business need to know. They shall only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from the company's Data Privacy Manager.

We have put in place procedures to deal with any suspected data security breach and shall notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long will you use my information for?

We shall only retain your personal information 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.

Details of retention periods for different aspects of your personal information are available from the company's Data Privacy Manager.

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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a customer or supplier of the company we shall retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

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

- Request access to your personal information (commonly known as a "data 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 we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or 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.
- 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 the transfer of your personal information to another party.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes or if you want to review, verify, correct or request erasure of your personal



information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party by emailing us at privacy@aquascot.com.

No fee usually required

You shall 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.

What we may need from you

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.

Right to 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. To withdraw your consent, please contact our Data Privacy Manager. Any use of your personal information before you withdraw consent remains valid.

Once we have received notification that you have withdrawn your consent, we shall 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.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and a digital copy of this privacy notice is available on our website. If you have any questions about this privacy notice, please contact our Data Privacy Manager by email to privacy@aquascot.com in the first instance.