

Supplier Privacy Notice

We Take Your Privacy Seriously

Rest assured - at GAP we're 100% committed to protecting your privacy and security.

We've been in the business for well over two decades - and are customers of hundreds of suppliers ourselves. So we completely understand how important it is to respect the information you've given us about yourself.

You'll have heard by now about some new rules governing what can and can't be done with information about you.

They're contained within the General Data Protection Regulation (GDPR) - and we've been studying them for months to make sure we're crystal clear about our obligations.

In anticipation of the changes, we've re-written the Supplier Privacy Notice and our Data Protection Policy to cut through the legal jargon and spell out exactly what we do with what you've told us about yourself and your business.

In a nutshell, it all boils down to four GAP Privacy Pledges. We promise that we will:

1. Only use the information you give us to improve the service we deliver
2. Protect your data like it's our own
3. Only ever talk your language. No nonsense, no spam, no and no cleverly worded sentences that leave you baffled!
4. Delete your information as soon as we no longer need it

This Supplier Privacy Notice sets out what personal data we, GAP, hold about you and how we collect and use it and this applies to all suppliers.

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other similar or additional information that we might give you from time to time about how we collect and use your personal data.

This Privacy Notice applies from 25 May 2018, when the General Data Protection Regulation comes into force. It does not give you any contractual rights. We may update this Privacy Notice at any time.

Who is the controller?

GAP Ltd (Partnership Way, Shadsworth Business Park, Blackburn, BB1 2QP) is the "controller" for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

We also have a dedicated Data Protection Team that is committed to making sure GAP is looking after all your information. If you have any queries, you can reach our Data Protection super-team on privacy@gap.uk.com.

So what is personal data?

Personal data means any information relating to a living individual who can be identified (directly or indirectly) using the information you give us (e.g. name, job title, company address, email address, mobile number etc.). It can be factual (e.g. contact details or how long you have been at the company), or an opinion about an individual's actions or behaviour.

Data protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data that is used to identify an individual is known as special category data. (The rest is ordinary personal data). But don't worry; we don't collect special category data from suppliers!

What type of ordinary personal data do we hold about you and why?

We collect, hold and use the following types of ordinary personal data about you:

- Publicly available information about you, such as your business social media presence, numbers on vans, contact email.
- Data including; name, address, email address, company registration number, company VAT number, your account activity, contact number, position within the company etc.

What are our legal grounds for using your ordinary personal data?

The new regulations set out specific reasons under which we can process this information about you.

When we ask you for your details, we will use one or more of the following reasons as to why we are asking for it:

- We need it to take steps (at your request) in order to **enter into a contract** with you. For example: we need to process company information in order to pay for products ordered.
- We need it to comply with a **legal obligation**, e.g. the obligation to provide you're the goods you have purchased.
- It is necessary for our **legitimate interests** (or those of a third party) and your interests and your rights (we will cover these later!) do not override those interests (legitimate interest). For example, if you send us an enquiry through our Rockdoor website, it is in our legitimate interest to give you a call to follow up on the query.

How do we collect your data?

You provide us with most of the personal data about you that we hold and use, for example when

you give us banking information to pay an invoice.

Some of the personal data we hold and use about you is generated from internal sources. For example, we may generate spend analysis so we can see how much we are spending with you as a supplier.

Some of the personal data about you that we hold and use may come from external sources. For example: information we get off Google regarding you or your company's services.

Who do we share your personal data with?

We may share some of your data with the following people, the types of data and our legal grounds for doing so are detailed below:

- We may share your information with the providers of the specialist systems we use to store and process your data. If we have system issues, these providers may require access to our systems and your data. Don't worry, system errors very rarely happen and the information the system providers see is very limited. Examples of this include: SAP, Sage, Infopos, Access Dimensions etc.
- We may also share your information with that of another supplier. We have a legitimate interest in sharing this information, particularly around project based work where we may have to facilitate you and another supplier working together.

Consequences of not providing personal data

If you do not wish to provide us with your information, that's entirely your choice. Please bear in mind that if you don't provide us with the information we require for the reasons we have stated, it is unlikely that we will be able to use you as a supplier.

How long will we keep your personal data?

We hate saying to goodbye, but if we need to do so we'll only hold onto your information for as long as it's needed to fulfil the contract between us and you and for as long as it's necessary to provide support-related communication or reporting.

If we think it's reasonably necessary or if we're required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may also keep hold of some of your information as required even after our business with each other has finished.

Your rights

The new regulations set out the rights that everyone has if a business is processing data about you, they are:

- *The right to make a subject access request.* This enables you to receive certain information about how we use your data, as well as to receive a copy of the personal data we hold about you and to check that we are doing exactly what we say we are doing!
- *The right to request that we correct incomplete or inaccurate personal data* that we hold about you. This speaks for itself, if we have the wrong email address or phone number, you have the right to tell us to make it right!
- *The right to request that we delete or remove personal data* that we hold about you where we don't have a good reason for keeping hold of it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- *The right to object to our processing* your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot give a good reason for processing the data about you.
- *The right to request that we restrict our processing of your personal data.* This enables you to ask us to suspend the processing of personal data about you, for example if you want us to tell you how accurate the information is or you want to know why we are asking for this information.
- *The right to withdraw your consent* to us using your personal data. Alongside this, you also have the right to request that we delete or remove that data, if we do not have another good reason to continue using it.
- *The right to request that we transfer your personal data to another party,* in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).

If, for whatever reason, you want to exercise any of these rights, please contact our Data Protection team on privacy@gap.uk.com. Please be aware that these rights are not concrete and in some circumstances we may be entitled to refuse some or all of your request.

GAP Web Sites

GAP web sites also collect and uses personal information. We do so as follows:

Tracking Site Visits

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to study the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on Google's developer guides. FYI our website uses the analytics.js implementation of GA.

Cookies

Cookies are very small harmless files that most websites put on to your computer when you roam their pages, to help the site run efficiently and make your user experience more enjoyable. Most Cookies are critical to a website's performance and your enjoyment of it. We have reviewed and adjusted our Cookie Notice to meet the requirements of GDPR.

In addition to GA's use of Cookies, this web site uses:

- Essential Cookies to help them run smoothly and allow the contents of a shopping basket to be transferred from the basket to an order whilst also identifying whether or not the visitor is a trade Account customer
- Information Cookies to gather anonymous information to assess how customers are using the website. This will then help us to improve certain pages of our site which may currently be poorly designed or unclear for the user. Information Cookies also highlight the most visited pages or broken links
- Helpful Cookies to help you when you return to the website. For example, they will save information such as name and address for when/if you are looking to make a repeat purchase and so make it a quicker and easier process for you
- Third Party Cookies to monitor and record your typical browsing habits whilst working in the background so only relevant ads are displayed

The basic rule is that we must:

- Tell you Cookies are in place and being used to monitor and record your usage of our websites. (Consider yourself told)
- Explain what the cookies are doing and why. (Tick)
- Get your consent to store a Cookie on your device. (You'll have seen the pop up when you landed on our sites)

As long as we do this the first time we set Cookies, the rules say we don't have to repeat it every time you visit our website.

That said we accept that that devices may be used by different people. So bearing in mind that there could be more than one user of your device, we plan to repeat the process at suitable intervals.

You can read our entire Cookie Notice on our website.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

IP Addresses

In addition to Google Analytics, this website may collect information (held in the public domain) attributed to the IP address of the computer or device that is being used to access it. The information is supplied to us from Whoisvisiting.com. Whoisvisiting.com is a service offered by Whoisdata Limited. The Whoisvisiting system does not use your IP address to identify you, the individual, in any way. No cookies are used by the Whoisvisiting system. The Whoisvisiting system

will only lookup information when a static IP address is being used. When a device is assigned a static IP address, the address does not change.

If you have any questions or concerns about how your personal data is being used by us, you can contact our Data Protection Team on privacy@gap.uk.com.

If you aren't happy with how GAP are processing your data, you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>