

PRIVACY POLICY

Who are we?

Dow Mus-Max Limited incorporated in England and Wales and is a 'controller' under the General Data Protection Regulation and the Data Protection Act 2018.

Whose data do we hold?

We may hold data about the following people:

- employees
- customers and clients
- suppliers and service providers
- advisers, consultants and other professional experts
- complainants and enquiries

Whose data will we collect?

We will only collect information from you that is relevant to the matter that we are dealing with. In particular, we may collect the following information from you which is defined as 'personal data':

- personal details
- family, lifestyle and social circumstances
- financial details
- business activities of the person whose details we are processing.

Special Categories

We may also collect information that is referred to as being in a 'special category'. This could include:

- physical or mental health details
- racial or ethnic origin
- religious beliefs or other beliefs of a similar nature
- criminal convictions
- sexual orientation

Basis for processing

The basis on which we process your personal data is one or more of the followings:

- it is necessary for the performance of our contract with you
- it is necessary for us to comply with a legal obligation
- it is in our legitimate interests to do so
- you have given us your consent (this can be withdrawn at any time by advising our data protection officers)

How will we use your data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- 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.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Who will we share your information with?

We may have to share your personal data with the parties set out below:

- Transport and courier companies
- Accountants
- Legal advisor/ lawyer
- Funding circles/ Finance
- Other customer/ Users
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where you authorise, us we may also disclose your information to your family, associates or representatives and we may also disclose your information to debt collection agencies if you do not pay our bills.

How long will we keep your information for?

We will only retain your personal data 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.

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.

Where you authorise us we may also disclose your information to your family, associates or representatives and we may also disclose your information to debt collection agencies if you do not pay our bills.

Transfers to third countries

- We may from time to time transfer your personal data to a country outside of the EEA
- Normally this will be necessary for the performance of our contract with us or for the exercise or defence of legal claims on your behalf
- Sometimes we may transfer for other reasons and we will ensure that appropriate safeguards are in place at all times.

Security arrangements

- We shall ensure that all the information that you provide us is kept secure using appropriate technical and organisation measures.
- In the event of a personal data breach we have in place procedures to ensure that the effects of such a breach are minimised and shall liaise with the ICO and with you as appropriate.
- More information is available from the data protection officer.

What rights do you have?

You have the following rights under the GDPR:

- right to be informed
- right of access
- right to rectification
- right to erasure
- right to restriction of processing
- right to data portability
- right to object
- rights concerning automated decision-making and profiling

Right of access

- you have the right to see the information we hold about you
- to access this you need to provide a request in writing to our data protection officer, together with proof of identity
- we will usually process your request free of charge and within 30 days, however we reserve the right to charge a reasonable administration fee and to extend the period of time by a further two months if the request is manifestly unfounded or vexatious and/or is very complex
- full details are available in our data subject access policy which is available on request from the data protection officer.

Right to erasure

- you have a right to ask us to erase your personal data in certain cases (details may be found in Article 17 of the GDPR)
- we will deal with your request free of charge and within 30 days but reserve this right to refuse to erase information that we are required to retain by law or regulation, or that is required to exercise or defend legal claims
- to exercise your right to erasure please contact our data protection officer.

Who can you complain to?

- If you are unhappy about how we are using your information or how we have responded to your request, then initially you should contact the data protection officer – Ann Wood.
- If your complain remains unresolved then you can contact the Information Commissioner's Office, details available at www.ico.org.uk