

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Sports Trophies & Engravers Ltd T/A Awardco also known as ST&E ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use www.awardco.co.uk and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Sports Trophies & Engravers Ltd T/A Awardco is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Awardco, 9 Bedford Business Centre, Mile Road, Bedford, MK42 9TW. For all data matters contact Nicholas Baker on 0844 477 5166 or dataofficer@awardco.co.uk

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To maintain our own accounts and records
- 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 right do not override those interests.
- Where we need to comply with legal or regulatory obligation.
- You may give us information about you by filling in forms on our site www.awardco.co.uk (our site) or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our site, subscribe to our service, and when you report a problem with our site.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data includes name, address, email address, phone number, financial and credit card information.

We have obtained your personal data from contact initiated by yourself or from publicly accessible sources.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

We do not collect any **Special Categories of Personal Data** about you this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with the following.

Internal Third Parties

Other companies in the ST&E Group acting as joint controllers or processors and who are based in the UK that provide IT and system administration services and undertake leadership reporting.

External Third Parties

1. Service providers acting as processors based in the UK who provide IT and system administration services.
2. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
3. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
4. Any other third parties, for example, market researchers, fraud prevention agencies, price comparison sites etc.

7. How long do we keep your personal data?

We will only retain your personal data for as long as necessary to fulfill 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.

By law we have to keep basic information about our customers including Contact, Identity, Financial and Transaction Data for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Providing us with your personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you for example, to provide you with goods or services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

11. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

12. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Awardco, 9 Bedford Business Centre, Mile Road, Bedford, MK42 9TW. For all data matters contact Nicholas Baker on 0844 477 5166 or dataofficer@awardco.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.