



## PRIVACY POLICY

We understand that privacy and the security of your personal information is extremely important. Because of that, this policy sets out what we do with your information and what we do to keep it secure. It also explains where and how we collect your personal information, as well as your rights over any personal information we hold about you.

This policy applies to you if your use of our services requires us to process your personal information. This may be over the phone, online, or otherwise by using any of our websites or interacting with us on social media. This policy gives effect to our commitment to protect your personal information and has been adopted by all of the companies and businesses in our group.

### Who we are

When we say 'we' or 'us' in this policy, we're referring to the Gregory Group. The Gregory Group consists of Gregory Distribution (Holdings) Ltd, Gregory Distribution Ltd, and Hayton Coulthard Transport Ltd (50:50 JV). For the purposes of data protection legislation we are the data controller and may also use data processors to process your information on our behalf.

### Personal data we collect

We may collect and process the following data about you:

#### Customers/Prospective Customers:

You may give us personal information about you by filling in forms or by corresponding with us by telephone, e-mail or otherwise. The information you give us may include your name, address, email address and phone number, financial and credit card information, information regarding your shipment such as the details and nature of the products being delivered, their source and their destination.

#### Job Applicants:

The applicant may directly, or through the use of a recruitment agency, provide us with personal contact information, employment history and reference contact information in the form of a CV, application form or speculative application via email or post.

#### Website Users:

We may obtain information about your usage of this website using Cookies – information relating to our use of Cookies can be found in our Cookies Policy. .

### How we use your personal information

When you contact the Company by submitting an application, request, enquiry or feedback, you will be agreeing to the use of your personal information by us to respond to you and facilitate the requirements of your request where necessary. This information will be used to:

- Fulfil your orders and provide refunds where necessary.
- Allow you to feedback on our services and for us to respond as required.
- Begin the employee recruitment processes
- Inform you about the performance of the Company.
- Help to improve and develop our services.

We must always have lawful grounds for processing your personal information, most commonly this will be to perform a contract that we have entered with you, or are about to enter into. Alternatively, we will process information where there is a legitimate interest to do so (for example when we are responding to your feedback and enquiries we will legitimately need to use your personal information in order to correspond with you).

From time to time we send information relating to the business and our products that we think may be of interest to our customers and former employees. If you do not want to receive this information, you can let us know by emailing [enquiries@gdl.uk.com](mailto:enquiries@gdl.uk.com).



### **Applying for a Job with us**

If you are applying for a role with us, any personal information that is provided in this process will only be used for the purpose of progressing your application. We will use your contact details to get in touch with you to progress the application and any other information to assess your suitability for the role for which you have applied. We do not share this information with anyone outside of the Company. If you are successful in your application, we will keep your information as part of your employee record in line with the internal Data Retention Policy and Employee Privacy Notice. In you are unsuccessful; your application information will be kept for a maximum of 6 months, unless it has been agreed with you that it can be retained for longer to be considered for any future roles with us. We will store your information securely and ensure only those involved in the recruitment process are able to access it.

### **How long we keep your information for**

Information about you is stored securely by us and will only be accessible to people that need to see it to carry out their job responsibilities. We keep your information for the duration of your relationship with us, after such a point it is removed from our systems in line with the Company Data Retention Policy.

### **Who we share your information with**

To provide the best service to our customers, we work with carefully selected third parties who are responsible for delivering certain functions on our behalf. These include, for example, companies that help us with technology services, processing payments, and delivering your orders. We will only share personal data that enables our third parties to provide their services. When we share your personal data with these providers we require them to keep it safe and not keep it for any longer than they need to in order to perform their responsibilities.

Personal information provided as part of an employment application may be used in order to request employment or personal references. Where this is the case, we will ensure that you are aware of our intention to do this and provide you with an opportunity to request this is done at a later point in the process. Failure to provide suitable references may result in our decision not to progress your application.

We may also share personal data with other organisations in such circumstances, for example, if the law or a public authority says we must share the personal data or if we need to share personal data in order to establish, exercise or defend our legal rights.

### **Your rights**

Under the terms of the current Data Protection legislation, you can request a copy of the details that we store and process about you on our internal systems and that is processed by Third Parties on our behalf. If you would like a copy of this, you will need to make a request to us stating the purpose of the request, your name, a contact address and phone number to:

#### **Data Protection Champion Lead**

**Address: Gregory Distribution Ltd, North Park, North Tawton, Devon. EX20 2EB**

**Phone Number: 0808 168 3408**

Please be aware, we may need you to provide additional information in order to confirm your identity and/or to confirm what information you wish to access in order to process your request. We will endeavour to respond to all requests within 30 days but if for a legitimate reason we are unable to, we will contact you to discuss.

We want to make sure that the personal data we hold about you is up to date and accurate. If any of the details are incorrect we will update them on your behalf when you advise us of any necessary changes. You may also request that we remove your information from our systems, object to us processing and can request to restrict how we process your information. If you have any queries or concerns about our use of personal information, please do not hesitate to contact us using the contact information above. If you believe we have not adequately addressed your concerns in a timely and satisfactory manner you have the right to complain to the Regulator (Information Commissioner's Office).

This is the latest version (v.1.0 – May 2018) of our Privacy Notice, it supersedes any previous versions. We reserve the right to amend our Privacy Notice from time to time.