



## **Data Protection & Privacy Policy**

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## Document History

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## Introduction

This data protection and privacy policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how The Travtec Group uses your data; for example, we will explain things such as how we use your data to keep you informed of useful documents, advice or technical tips regarding your IT systems, as well as marketing information and special offers.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time.

## Who are The Travtec Group?

Travtec Limited and Sunala Limited make up the Travtec Group– which we'll refer to as 'we and us' in this document – are a registered Limited Company in the UK who supply coding, marking, consumables and product handling systems

## Explaining the legal bases, we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

### Consent

In specific situations, we can collect and process your data with your consent. For example, when you subscribe to receive email newsletters. When collecting your personal data, we will always make clear to You which data is necessary in connection with this.

### Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting the business to law enforcement.

### Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase and enquiry data to send you or make available any offers we feel may be relevant to you.

We also combine the account data of many clients to identify trends and ensure we can keep up with demand or develop new products/services. The data used in this way is not personally identifiable.

We may also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

### When do we collect your personal data?

- When you visit any of our websites
- When you purchase products or services from us.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you choose to complete any surveys or questionnaires we send you
- When you comment on or review our products and services.
- When you've given a third-party permission to share with us the information they hold about you.

### What sort of personal data do we collect?

- If you have purchased products or services from us: your name, gender, billing/delivery address, orders and receipts, email and telephone number.
- If you log service requests or faults, we will additionally collect information about the type of fault you are having and the equipment you are using.
- Details of your purchase preferences are collected if you have a non-standard configuration.
- Details of your visits to our websites or apps, and which site you came from to ours.
- Information gathered using cookies in your web browser.
- Payment information.
- Your comments and reviews.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

### How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, if you've asked us to let you know about a forthcoming product or service, we can't do that if you've withdrawn your general consent to hear from us.

### Here's how we'll use your personal data and why:

To process any orders that you make or services that you require. If we don't collect your personal data during the quote/proposal/order process, we won't be able to process your order and comply with our legal obligations.

To respond to your queries, refund requests and complaints. Handling the information you have sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our services to you.

To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account.

If we discover any criminal activity or alleged criminal activity through our use of fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the companies & individuals we interact with from criminal activities.

With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web or text about relevant products and services including tailored special offers, discounts, promotions, events, and so on. Of course, you are free to opt out of hearing from us by any of these channels at any time by contacting us or selecting unsubscribe on any email marketing communication.

To send you relevant, personalised communications by email and post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest. You are free to opt out of hearing from us by email or post at any time.

To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, and legally required information relating to your orders or enquiries. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.

To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

To comply with our contractual or legal obligations to share data with law enforcement.

To send you survey and feedback requests to help improve our services. We have a legitimate interest to do so as this helps make our products or services more relevant to you. Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences. Details of how to do this can be found on the footer of any marketing or promotional emails.

## How we protect your personal data

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites and apps using 'https' technology. Access to your personal data is password-protected, and sensitive data is secured.

We regularly monitor and audit our system for possible vulnerabilities and ensure security is in place.

## How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods:

### Orders

When you place an order, we'll keep the personal data you give us for five years, so we can comply with our legal and contractual obligations.

### Warranties

If we have supplied one of our manufactured items, this will carry a unique serial number. Your data may be stored for many years as we expect our machines to last upwards of 10 years +

## Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- Partners and companies where there is a collaborative project
- Operational companies such as delivery couriers & Royal Mail

Sharing your data with third parties for their own purposes:

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

To help personalise your journey on our website we currently use the following companies, who will process your personal data as part of their contracts with us:

- Google
- Facebook
- LinkedIn

## What are your rights over your personal data?

An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete. For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a warranty).
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You have the right to request a copy of any information about you that The Travtec Group holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact:

**Alan Turner @ Travtec Limited Unit 2 Orford Court Greenfold Way Leigh, Lancashire. WN7 3XJ**

or email:

**info@travtec.co.uk**

To ask for your information to be amended, please contact:

Alan Turner @ Travtec Limited Unit 2 Orford Court Greenfold Way Leigh, Lancashire WN7 3XJ or  
info@travtec.co.uk

If we have a legitimate reason not to action your request, we will explain fully to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## [How can you stop the use of your personal data for direct marketing?](#)

There are several ways you can stop direct marketing communications from us:

Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails.

Write to: The Travtec Group, Unit 2 Orford Court, Greenfold Way, Leigh Lancashire WN7 3XJ

*Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.*

### 1. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.