

Introduction

This document sets out the privacy policy of Trust Distribution Ltd (Trust) in relation to our processing and use of personal data, and replaces all previous versions of our privacy policies. This document is not intended to, and does not create any contractual rights, and does not affect any rights in law.

About us

Trust Distribution Ltd is a channel Distributor of Telecommunications equipment, the company is registered in England and Wales under company number: 05354872 and is registered at: Phoenix Park Industrial Estate, Off Park Street, Heywood, OL10 2AB.

Data Privacy

Data Privacy and security is of the upmost importance to us. Trust is committed to the protection, security and privacy of our users and therefore we conduct our business in line with current data protection laws and as outlined by current GDPR regulations. This document will be updated as required in line with any future legislative changes.

Policy

This policy applies to information collected directly by Trust and via the Trust website under the domain name www.trustdistribution.com which is owned and operated by Trust Distribution Limited. The Policy explains our practices relating to personal data privacy and security including:

- the information that you may be requested to supply,
- types of information we collect,
- how we use the information,
- rights you have about the use of your personal information,
- security measures we implement to protect the security of your information,
- how you can contact us.

Information we collect

The purpose of the personal data that we collect from you will depend on how you interact with Trust and the Trust website. This section will explain what type of information is collected, how the information may be collected, and how this information contributes to how we deal with you and aids with the development of the website and the services that we offer.

Information you provide & the legal basis for use

You may be requested to provide personally identifiable information when you:-

- | | |
|---|-----------------------|
| - apply for a trading account, | (Contract) |
| - place an order, | (Contract) |
| - request tech support for problem resolutions, | (Contract) |
| - contact us by any means, | (Legitimate Interest) |
| - register for access on our website, | (Legitimate Interest) |
| - submit an enquiry, | (Legitimate Interest) |
| - complete website forms, | (Legitimate Interest) |
| - request product and service updates, (existing customer), | (Legitimate Interest) |

- supply staff images for use in customer related publications, (Legitimate Interest)
- request product and service Information, (potential customer), (Consent)

Legal basis definitions

- **CONTRACT:** The processing is necessary for a contract, or specific steps need to be taken before entering into a contract.
- **LEGITIMATE INTEREST:** The processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
- **CONSENT:** The individual has given clear consent to process personal data for a specific purpose.

Information we may request

When submitting information for the purpose of any of the above we may collect details such as:-

- name,
- job title,
- e-mail address,
- company name,
- department within the company,
- contact telephone number,
- contact mobile number,
- business address (or private address if a Sole Trader or Partnership),
- credit/debit card Information (note, this information is not stored after use).

Essential information

Some of this data is essential for us to be able to efficiently and accurately identify who you are and enable us to respond to your requests.

Cookies or other tracking technologies

We use cookies when you visit our website. A cookie is a small text file that is downloaded onto 'terminal equipment' (eg: a computer, smartphone etc), in order to improve our service and to provide you with more relevant content by analysing how you use our website. These cookies do not interfere with or have access to any other information on your computer. Please also note that in most cases we are not able to identify you from the information we collect using these technologies.

We use cookies to collect information from your browser to:

- distinguish you from other users of our website,
- gather website visitor data to optimise viewing content,
- promote product or service offers more relevant to you,
- assist in improving your browsing experience,
- improve our website navigation facility,
- record usage patterns to identify popular areas of the site and those that are not,
- analyse product and service searches to improve our range,
- provide more tailored marketing to more closely meet your needs.

Most internet browsers are pre-set to accept cookies, however if you are concerned about cookies, you can adjust your internet browser to block all cookies or to receive a warning if cookies are being used. You may want to visit – www.cookiesandyou.com for more information.

Analytics

The Trust website uses Google Analytics, which is tracking software used by us to monitor visitor site usage. This also use cookies as outlined above, and the information generated by the cookie about how you use the website (including IP address) will be transmitted and stored by Google on servers in the United States.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser.

You can access Googles privacy policy here: www.google.com/privacy.html for your information.

If you want further information on how to remove this function you may want to visit the Google Analytics Opt-out Browser using the following link: tools.google.com/dlpage/gaoptout for more information.

Information Processing

The data that you provide may be used in any of the following ways:-

- to prepare, negotiate or carry out a contractual obligation,
- to carry out credit searches with credit reference agencies (where applicable),
- to obtain trade references,
- to respond to, or action a submission or enquiry,
- to allow feedback on our products or services,
- to market relevant information on products and services to you.

Credit references

If you request a credit account with Trust for your purchases, we may undertake various searches and enquiries to obtain whatever references or other information we consider necessary, including carrying out searches with credit reference agencies. We may also provide details of your credit history with Trust on request of a credit reference from a third party. Credit reference agencies may add to their records details of our search, which may then be seen by other organisations, and may be linked to records of others associated with you. NOTE: We will not forward or share any personal information with any third parties only relevant company information.

Email marketing

In order for us to understand how our customers interact with the marketing emails that we send, the email tools we use let us know if the emails we send are opened or links are clicked on. We use this information to make the content that we send as relevant to you as possible.

If we are sending marketing communications using your data, by law you have the right to ask us to stop doing this, you can either use the 'un-subscribe' option on the email or contact us with your request using the contact details as outlined in this document.

Information collection and processing impact

The personal data that we request for facilitating trading terms is minor and is limited to the level of information required to enable us to effectively trade with our customers.

The information that you provide to us to process on your behalf to carry out a contract is generally of a non-sensitive nature, therefore we do not anticipate any adverse impacts of our collection and usage of such data.

Information sharing

We do not sell or share data with any third parties except as provided in this policy, or required or permitted by law or as consented or requested by you to carry out a business function. If we do share data with third parties, such sharing will be limited to such Information that is appropriate to facilitate the purpose.

Third Party Functions

Where we would normally use third party companies and forward either your information or your customer's information to facilitate requests or to fulfil an order or contract is outlined below:

- **COURIERS:** To deliver goods to you or your customers on your instruction,
- **LICENSING:** To forward licences via email to you or your customers on your instruction,
- **LEASING:** To facilitate finance deals for you or your customer on your instruction,
- **INSTALLATION & NETWORK SERVICES:** To organise services for you or your customer on your instruction.

Protection of personal information from children

We acknowledge the importance of the protection of the privacy of children and as Trust is a business to business Distributor, we do not knowingly solicit information from children and we do not market the website or its content to them.

Legal obligation

Where it is necessary for law enforcement purposes, or where there is a threat to a person's safety or health, we may need to disclose your personal data as required by law.

Information storage and security

We work hard to keep all data safe. We use a combination of technical, administrative, and physical controls to maintain the security of your data. No method of transmitting data is completely secure however, so if you have a security related concern, please contact us using the contact details listed in this document.

All information that you provide to us is stored on secure servers. Where you have registered a password which enables access to certain parts of our website, you are responsible for keeping this password safe and confidential.

The effectiveness of our security controls is continually monitored and any necessary changes or improvements implemented.

Data breaches

We will report any known data breach of the trust database(s) or any third party data processors that we work alongside to complete our contractual obligation or your requests as outlined within the guidelines set out by the ICO.

Information retention and legal obligation

We maintain account information for as long as your trading account is in existence so that we are able to operate your account in line with our contractual obligations and, or our legitimate business interests. If you cease to be a customer or no longer trade we will retain certain information that takes into account of our legal and accounting obligations along with balancing this with what would be considered a reasonable period of time to hold the Information or to prevent harm to the rights of Trust.

Website links and downloads

Trust acknowledges that you may click through to third party sites from our website. If you follow a link to any of these sites, please note that they will have their own privacy and cookie policies and that we do not accept any responsibility or liability for them or for any data which they may capture. Please refer to the privacy statements detailed on these websites.

Whilst every effort has been taken to ensure that only genuine downloads and files are available through our website we suggest the use of anti-virus software to check authenticity.

End User Contacts

Trust Distribution is a trade only Distributor and don't deal directly with end users. If an end user may contact us in regards to products or services we may pass on your details to one of our Resellers to contact you to fulfil your request. If your information is passed on to a Reseller we will inform you of this.

Rights of access

Trust fully supports the principle of "fair and transparent" processing of personal information. We support your rights in relation to your personal information under the General Data Protection Regulation, including the:

- right to be informed (chiefly via this policy),
- right of access,
- right to rectification,
- right to erasure,
- right to restrict processing,
- right to data portability,
- right to object,
- rights related to automated decision-making including profiling.

To act any of the above rights please complete the Data Subject Request Form found on our website.

Contact details

Any information requests or questions can be submitted directly using the contact details listed below:-

Address

F.A.O. The Data Processing Manager
Trust Distribution Ltd
Phoenix Park Industrial Estate
Off Park Street
Heywood. OL10 2AB.

Web

www.trustdistribution.com

E-mail

gdpr@trustdistribution.com

Identification

When contacting Trust for anything to do with your personal Information you will be requested to provide proof of identity to confirm that we are acting on your request or only providing your personal information to you.

Checking our privacy policy

We may make changes to this privacy policy from time to time in line with new regulations and developments, you should therefore periodically visit our website to check that you are up to date with any amendments.

The latest version will be posted on the website.