Axess International Ltd GDPR compliant Privacy Notice

Axess International Ltd 'Axess' is committed to protecting your privacy and takes its responsibilities regarding the security of user information very seriously. This privacy statement sets out how Axess complies with both UK and European Union data protection requirements. We have structured our website so that you can visit without identifying yourself or revealing any personal information. Once you choose to provide us with any information by which you can be identified, then you can be assured that it will only be used in accordance with this Privacy Statement.

If you have any queries about the policy, please get in touch with us using sales@axessinternational.com or write to us at Axess International Ltd, Unit 5 Stephenson Close, Drayton Fields Industrial Estate, Daventry, Northamptonshire NN11 8RF and we will do our best to answer your questions.

Axess may change this policy from time to time by updating this page and we advise that you revisit this page occasionally to ensure that you are happy with any changes.

This privacy policy was last updated on 10th April 2018.

What Personal data we collect

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

The personal data we may collect from you and process is:

- Contact details, such as name, postal address, telephone number and email address
- Financial and transaction data, such as credit or debit card number, and bank account information where necessary for processing an order

Other data that we may collect from you is:

 Browser and device data, such as IP address, device type, operating system and Internet browser type

- Transaction data, such as purchases, purchase amount, date of purchase and payment method
- Cookie and tracking technology data, such as time spent on website, pages visited and other anonymous traffic data

How we use your information

This privacy notice tells you how we, Axess, will collect and use your personal data:

- To provide our products and services.
- To process your order.
- To personalise the website for you.
- To contact you in response to a specific enquiry.
- To send you promotional emails and mailings about *Axess'* products, services, offers and other things that we think may be relevant to you.
- To contact you via telephone about Axess' products and services that we think may be relevant to you.
- To contact you via email or telephone for market research reasons.
- To improve or modify our services.
- For audits, legal or regulatory purposes, and compliance with industry standards.
- To conduct aggregate analysis and develop business intelligence that enables us to operate, protect, make informed decisions, and report on the performance of, our business.

Why does Axess need to collect and store personal data?

In order for us to provide you with our products and services, allow access to our events and to maintain our accounts and records, we process your information under the legal basis of *Contract*.

Most of the personal information we process from Users will be freely given and will be used in the context in which it is provided. For example, a User may complete an enquiry form or make a purchase from our website, in these cases the information will be used to respond to the enquiry or to deliver the requested goods to the address provided. Where this information is provided, it is assumed that the User gives their permission for the personal data to be used for this purpose.

We may also process the personal information for our *Legitimate Interests*. We describe our *Legitimate Interests* as:-

We have an interest in informing our Customers of similar new products, products associated with a product bought from us, customer service feedback, understanding our customers, to produce and distribute printed material plus emailing of electronic catalogues or other similar documents, news and updates relevant to our Company or Industry. We may use your email address to send you emails regarding the above or similar topics. Users have a right to object to this processing by emailing sales@axessinternational.com In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy.

Will Axess share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Axess in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. This includes but is not limited to, arranging deliveries, event registration and subscription fulfilment. When they no longer need your data to fulfil this service, they will dispose of the details in line with Axess' procedures. If we wish to pass your personal data onto a third party we will only do so once we have obtained your consent unless we are legally required to do otherwise.

We do not share personal information with anyone that is not necessary to the delivery of goods or services bought from us, to manage or support our business activities or to fulfil our *Legal Obligations*.

How will Axess use the personal data it collects about me?

Axess will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Axess is required to retain information in accordance with the law, such as information needed for calculation of tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs. In any case, personal information processed when making a purchase from Axess will be held for a minimum of 6 years as required by HMRC.

Under what circumstances will Axess contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

What rights do I have under GDPR?

A full list of your rights and when they apply can be found at this link

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

Can I find out the personal data that the organisation holds about me?

Axess, at your request, can confirm what information we hold about you and how it is processed. If Axess does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has
 determined how and why to process your data. In some cases, this will be a
 representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of *Axess* or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

What forms of ID will I need to provide in order to access this?

Axess requires that 2 forms of identification are provided and at least one must include a photograph. The following forms of ID are accepted:

Passport, driving license, birth certificate or utility bill (from last 3 months).

All Data Subjects have the right to lodge a complaint about how their Personal Information is processed with the Information Commissioners Office (ICO), though we would ask in the first instance that you contact *Axess* to resolve any complaint you may have. Our postal and email addresses are given at the beginning of this notice.