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## **GDPR Statement of Compliance** (for customers )

During its business activities the Company must process personal data. Arbor Trading will hold minimal personal information to allow us to perform day to day business activities - in doing so, the Company acts as a data controller.

Arbor Trading will comply at all times with the principles of the General Data Protection Regulation (GDPR) when dealing with all data received.

This statement demonstrates our commitment to ensure your right to privacy is protected at all times during your dealings with us.

The Company must have a legal basis for processing your personal data. This privacy statement covers all data provided to us by you, as a registered customer of Arbor Trading for the purpose of providing you with relevant business services. To this end we will only use your personal data in accordance with the terms of the following statement:

### **1. Collection and use of personal data**

#### **a. Purpose of processing and lawful basis**

The Company will collect and process personal data for the purposes of processing routine business transactions relevant to the business service/s you have engaged with us to provide. The information we hold in our system is limited to the information provided by you or your company for these purposes. This includes for example, contacting you about the service/s we are supplying or have supplied to you, discussing any forthcoming suitable opportunities, updating our databases, arranging invoicing and processing payments with you and developing and managing our relationship with you as a client of the Company.

In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during any internal audits to demonstrate our compliance with certain industry standards.

The lawful bases we rely upon to process your personal data are:

- Legitimate interest
- Your consent
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

#### **b. Legitimate interest**

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data this is:

- Applicable as a Company who has entered into a business transaction with you to provide you with a service/s
- Updating our database.

**c. Consent**

Where the Company relies on Consent to process your data this is:

- For the specific purpose of processing your data in relation to and as part of providing you or your Company with information relating to our products and services.

**d. Legal obligation**

Where the Company relies on legal obligation to process your personal data our legal obligation:

- may be applicable where we have provided you or your Company with a service/s and as part of managing and developing the ongoing relationship
- to communicate with you in relation to and during the term of, or after any contract or agreement we have with you to supply you or your Company with a service/s
- to provide for administrative processes associated with your engagement with us as a client to the business, or a named contact at a business that is a client to us
- to comply in all circumstances with the Company's legal obligations relating to retention of records and reporting where applicable to relevant authorities.

**e. Contractual obligation**

Where the Company relies on fulfilling a contractual obligation (through our Terms and Conditions) to process your personal data this:

- may be applicable in fulfilling the terms applicable in any contract we have entered into with you to provide you or your Company with a service/s
- may be applicable in fulfilling a contract with a third-party as part of our service provision to you or your Company.

**f. Categories of data**

The Company only collects and holds minimal personal data, and only collects information considered reasonable and as required to appropriately meet with your needs during the delivery of a service/s to you as a client.

Personal data:

- Name
- Contact details, including a telephone number, email address and postal address

This information will have been provided by you directly or by your Company.

**g. Recipient/s of data**

The Company may process your personal data with the following recipients:

HMRC  
Our Accountants  
Quickbooks

Please note there may be a requirement during the course of our business activities and for compliance and regulatory purposes, that your personal information may be shared with supervisory or regulatory authorities for the purposes of internal audits and investigations carried out on the Company to ensure that the Company is complying with all relevant laws and obligations.

Please be advised that we only share your data where applicable with partners that comply with the General Data Protection Regulation.

## **2. Data retention**

The Company will retain any personal data for as long as is necessary. Different laws require us to keep different data for different periods of time and you should be aware that where you have engaged our services as a supplier to your Company, then we will retain records relating to any contract or agreement with you for the service/s we provide and details of any support or transaction details for as long as is legally required.

## **3. Control of Data**

If you believe that any of the personal data that the Company processes is incorrect or incomplete, please contact us and we will take reasonable steps to check its accuracy and correct it where necessary.

You have the right to withdraw consent for us to process any personal data you have provided at any time and should this be the case then please contact your representative of the Company.

There may be circumstances where the Company will still need to process this personal data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

## **4. Data Security**

The Company takes every precaution to protect the personal information it collects as part of its business activities. We have physical, electronic and managerial procedures in place to safeguard and make certain the information we hold is secure. We have restricted access in place meaning any personal information is only accessible by employees of our company who require the access in order to perform a specific part of their job role.

We will never sell or exchange your personal details or those of any employee of your Company with any third-party without first obtaining your consent or where appropriate the consent of your employees.

## **5. Changes to this privacy statement**

We will update this privacy statement from time to time. If we make any material changes, we will notify you.

## **6. Complaints or queries**

We work hard to ensure your personal data is treated safely and securely. However, if you have a complaint then please write to us. You also have the right to raise concerns with Information Commissioner's Office (ICO) on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.