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**GDPR Statement of Compliance**  
**(for Suppliers)**

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 supplier to Arbor Trading for the purpose of processing routine business transactions. 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 your personal data for the purposes of processing routine business transactions. The information we hold in our system is limited to the information provided by you or your company for this purpose. This includes for example, contacting you about services you are supplying or have supplied to us, discussing forthcoming suitable opportunities, updating our databases, arranging payments to you and developing and managing our relationship with you and our clients.

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
- 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 for you to provide us with products or services.

**c. Legal obligation**

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

- may be applicable where you or your Company have provided products or services to us 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 for you to supply products and/ or services to us as a Company
- to provide for administrative processes associated with your engagement with us as a supplier to the business, or a named contact at a business that is acting as a supplier to us. This may include holding bank account details where applicable for us to make payments to you
- to comply in all circumstances with the Company's legal obligations relating to retention of records and reporting where applicable to relevant authorities, such as HMRC.

**d. 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 to us in any contract we have entered with you for you to provide us with products and/ or services
- may be applicable in fulfilling a contract with our clients to which you are a third-party supplier
- updating our database

**e. Categories of data**

The Company only collects and holds minimal personal data, and only collects information considered reasonable and as required to appropriately process business transactions related to your provision of products and/ or services to us.

Personal data:

- Name
- Contact details, including a telephone number, email address and postal address
- [Bank account details – where applicable]

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

**f. Recipient/s of data**

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

HMRC  
QuickBooks  
Our Accountants

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 your 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 we have engaged your services as supplier to our Company we will retain records relating to any contract or agreement with you for the products and/ or services you provide and details of any transactions for as long as is legally required.

### **3. Control of Data**

If you believe that any of your 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 your data 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 your 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 your information. 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 your personal information is only accessible by employees of our company who require access to it in order to perform a specific part of their job role.

We will never sell or exchange your personal details with third parties without obtaining your consent.

### **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.