

## **Online Privacy Statement**

Last updated May 2018

Our Privacy Undertaking

We will:

- Keep your personal data safe and private
- Not sell your data to 3<sup>rd</sup> parties
- Give you ways to manage and review how we interact with, and market to you at any time

Vink UK Limited trading as UKAP ("**us**", "**we**", "**our**") is committed to protecting and respecting your privacy.

Our privacy policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. For the purposes of the General Data Protection Regulations, the data controller is Vink UK Limited, a company incorporated in the United Kingdom with company number 12207746 and a registered office of Holmes House, 24-30 Baker Street, Weybridge, Surrey KT13 8AU.

Our privacy policy applies to all companies (not necessarily named UKAP) associated by way of ownership with the Vink UK Limited family of companies, websites in the Vink UK Limited family of companies, Vink online applications that run on smart phones, tablets, and other mobile devices ("apps") as well as your use or access of any of our online services, content.

If you are an existing customer or supplier we already have limited personal information of yourself or of your staff, such as names and family names, contact details, birthdays, addresses, payment details, etc. Maintaining and processing this personal data is necessary for continued trade between the Vink UK Ltd family of companies and yourself.

By continuing to trade with UKAP and its associated companies or by submitting any personal data, you agree to this collection, transfer, storing, maintenance and / or processing in so far as the data is necessary for the purpose for which it has been collected. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the GDPR.

We may from time to time change this privacy policy as the need arises from changes in European legislation or local country legislation. When such changes take place, you will be notified.

With the exception of personal data specified in this policy we may collect additional personal information from you, only if you have chosen to provide it to us.

### **Use made of the information**

We may use information held about you for various reasons, for example:

- To carry out our obligations arising from any contracts entered into between you and us
- To comply with any legal and /or statutory obligation in terms of relevant municipal laws
- To ensure that content from our site is presented in the most effective manner for you and for your computer
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes
- To allow you to participate in interactive features of our service(s), when you choose to do so
- To notify you about changes to our products and/or service(s)

If you are an existing customer, we may contact you by email, telephone, printed media or in other manners with information about goods and services similar to those which were the subject of a previous sale to you.

UKAP does not share the personal information of its customers or suppliers and/or their employees with any third parties for the purposes of further marketing by those third parties.

The information we collect from you depends on what activities you are carrying out on our site(s), whether you are logged in or not and whether you are placing an order. For example, we may collect, process, maintain and store some, all, or any combination of the following personally identifiable information about you:

- Contact Name (First and family names)
- Company Name, registration number and tax related numbers
- Postal and / or physical address
- Payment details (which may include credit card or banking account information)
- Contact telephone number(s)
- Contact email address(es)
- Contact person(s) names

Examples of instances when such information may be collected, processed, maintained or stored are when you:

- Provide the information by completing online forms on our site: This includes information provided at the time of registering to use our site, purchasing our products, completing the "Contact Us" form. We may also ask you for information when you report a problem with our site
- Contact us: we may keep a record of that correspondence
- Complete surveys that we use for research purposes or to enhance our services: There will however be no obligation on your part to respond to them
- Complete transactions through our site and for the fulfilment of your orders
- Visit our site(s) and access resources we may collect data with the use of cookies (See below for more on Cookies)

- Trade with us, including requests for offers, quotes, etc. In such cases the collection of personal data will also potentially be necessary to complete the trade contract

UKAP also relies on collecting data to further its legitimate interests as a basis of lawfulness of processing.

For UKAP a legitimate interest is when we have a business or commercial reason to use your information. Even in these circumstances the legitimate interest must not unfairly go against your rights in terms of the GDPR. Generally, we will rely on legitimate business interest when collecting the following, or any combination of the following, categories of personal information:

<b>Category of personal information</b>	<b>Description (Examples)</b>	<b>Purpose of processing</b>
Identity	Name(s) Family names Contact person's / representatives names	<ul style="list-style-type: none"> <li>• General communications with trading partners</li> <li>• Being efficient about how we fulfil our legal duties</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> <li>• Complying with regulations that apply to us</li> </ul>
Financial	Credit limits Payment history Banking details	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal duties</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> <li>• Complying with regulations that apply to us</li> </ul>
Contact	Physical address for delivery purposes Phone numbers and/or e-mail address for contact purposes	<ul style="list-style-type: none"> <li>• General communications with trading partners</li> <li>• Being efficient about how we fulfil our legal duties</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> <li>• Complying with regulations that apply to us</li> </ul>
Transactional	Sales orders (customers) Purchase orders (suppliers) Related payments to the above	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal duties</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> <li>• Complying with regulations that apply to us</li> </ul>

Category of personal information	Description (Examples)	Purpose of processing
Contractual	Details about the trading relationship that we have with you	<ul style="list-style-type: none"> <li>• General communications with trading partners</li> <li>• Being efficient about how we fulfil our legal duties</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> <li>• Complying with regulations that apply to us</li> </ul>
Locational	Data we get about where you are, the address where you connect a computer to the internet	<ul style="list-style-type: none"> <li>• General communications with trading partners</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> <li>• Complying with regulations that apply to us</li> </ul>
Behavioural	Information on how you use our products and services	<ul style="list-style-type: none"> <li>• Figuring which of our products and services may interest you and informing you about them</li> <li>• Developing products and services, and marketing such products and services, and making trade offers</li> </ul>
Open Data and Public Records	Details about you that are in public records and information about you that is openly available on the internet, or that you may have made shared through social media	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal duties</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> </ul>
Usage Data	General data about how you use our products and services	<ul style="list-style-type: none"> <li>• General communications with trading partners</li> </ul>
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include items such as credit references, general correspondence, etc.	<ul style="list-style-type: none"> <li>• General communications with trading partners</li> <li>• Being efficient about how we fulfil our legal duties</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> <li>• Complying with regulations that apply to us</li> </ul>

Category of personal information	Description (Examples)	Purpose of processing
Consents	Any permissions, consents, or preferences that you give us. This may include items such as how you want us to contact you, whether you prefer to receive paper invoices and statements, or prefer e-mail formats.	<ul style="list-style-type: none"> <li>• General communications with trading partners</li> <li>• Being efficient about how we fulfil our legal duties</li> <li>• Being efficient about how we fulfil our legal and contractual obligations</li> <li>• Complying with regulations that apply to us</li> </ul>

The table below lists examples of the ways that we may use your personal information, and the bases that we rely on to do so.

<b>Purpose for data processing</b>	<b>How data is processed</b>	<b>Legal basis for processing</b>	<b>Duration of processing</b>	<b>Recipients of the personal data</b>	<b>Transfer to countries which do not offer adequate data protection.</b>
<ul style="list-style-type: none"> <li>• To manage our trading relationship with you</li> <li>• To develop new ways to meet your needs and to grow our business</li> <li>• To develop and carry out marketing activities</li> <li>• To study how you use our products and services</li> <li>• To provide advice or guidance about our products and services</li> <li>• To solicit feedback regarding our products and services</li> </ul>	<ul style="list-style-type: none"> <li>• Collected</li> <li>• Stored</li> <li>• Recorded</li> <li>• Consulted</li> <li>• Used</li> <li>• Disseminated or otherwise made available</li> <li>• Aligned or combined</li> <li>• Archived</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent (new trading partners)</li> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal obligation(s)</li> </ul>	<ul style="list-style-type: none"> <li>• Duration of the contract</li> <li>• As prescribed by data retention laws</li> <li>• Where applicable, for the period of an online session</li> </ul>	<ul style="list-style-type: none"> <li>• Vink UK Limited companies</li> <li>• Governmental and regulatory bodies</li> <li>• Where applicable 3<sup>rd</sup> party contractors</li> </ul>	None

<b>Purpose for data processing</b>	<b>How data is processed</b>	<b>Legal basis for processing</b>	<b>Duration of processing</b>	<b>Recipients of the personal data</b>	<b>Transfer to countries which do not offer adequate data protection.</b>
<ul style="list-style-type: none"> <li>• To deliver products</li> <li>• To make and manage customer and supplier payments</li> <li>• To manage customer accounts</li> <li>• To collect and recover money that is owed to us or make supplier payments for money that we owe</li> </ul>	<ul style="list-style-type: none"> <li>• Collected</li> <li>• Stored</li> <li>• Recorded</li> <li>• Consulted</li> <li>• Used</li> <li>• Disseminated or otherwise made available</li> <li>• Aligned or combined</li> <li>• Archived</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Duration of the contract</li> <li>• As prescribed by data retention laws</li> </ul>	<ul style="list-style-type: none"> <li>• Vink UK companies</li> </ul>	None
<ul style="list-style-type: none"> <li>• To comply with laws and regulations that apply to us</li> <li>• To respond to customer and supplier's complaints and seek to resolve them</li> </ul>	<ul style="list-style-type: none"> <li>• Collected</li> <li>• Stored</li> <li>• Recorded</li> <li>• Consulted</li> <li>• Used</li> <li>• Disclosed</li> <li>• Disseminated or otherwise made available</li> <li>• Combined</li> <li>• Archived</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal obligation(s)</li> </ul>	<ul style="list-style-type: none"> <li>• As prescribed by data retention laws</li> </ul>	<ul style="list-style-type: none"> <li>• Vink UK companies</li> <li>• Governmental and regulatory bodies</li> </ul>	None

<b>Purpose for data processing</b>	<b>How data is processed</b>	<b>Legal basis for processing</b>	<b>Duration of processing</b>	<b>Recipients of the personal data</b>	<b>Transfer to countries which do not offer adequate data protection.</b>
<ul style="list-style-type: none"> <li>To run our business in an efficient, effective and economic manner. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit</li> </ul>	<ul style="list-style-type: none"> <li>Collected</li> <li>Stored</li> <li>Recorded</li> <li>Consulted</li> <li>Used</li> <li>Disclosed</li> <li>Combined</li> <li>Archived</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests</li> <li>Our legal obligation(s)</li> </ul>	<ul style="list-style-type: none"> <li>Duration of the contract</li> <li>As prescribed by data retention laws</li> </ul>	<ul style="list-style-type: none"> <li>Vink UK companies</li> <li>Governmental and regulatory bodies</li> </ul>	None
<ul style="list-style-type: none"> <li>To exercise our rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Collected</li> <li>Stored</li> <li>Recorded</li> <li>Consulted</li> <li>Used</li> </ul>	<ul style="list-style-type: none"> <li>Fulfillment of contracts</li> </ul>	<ul style="list-style-type: none"> <li>Duration of the contract</li> <li>As prescribed by data retention laws</li> </ul>	<ul style="list-style-type: none"> <li>Vink UK companies</li> </ul>	None

When you provide personal information on one of our websites you:

- Are made aware that UKAP or its associated companies may collect, maintain and process your personal information.
- Confirm that any information that you provide is true, accurate and complete, and that you will not deliberately provide any false information nor impersonate any other person or entity or misrepresent yourself or any other person or entity.

Our websites and apps are not intended for children under 16 years of age. We will not knowingly solicit data online from, or market online to, children under 16 years of age.



### **Automated decision making and profiling, and special categories of personal data**

In terms of the GDPR you have a right to object against automated decision making and profiling based on special categories of data.

Special categories of data refer to personal data regarding ethnic or racial origin, trade union membership, criminal records, etc. UKAP does not collect, store, maintain or process any of the special categories of data. If this status changes at any stage in the future, we will update this online privacy statement accordingly.

Automated decision making, and profiling refers to a process of allowing computer systems to generate outcomes that have legal effect. In general UKAP does not make use of automated decision making and profiling in its relationship with trading partners. If this status changes at any stage in the future, we will update this online privacy statement accordingly and you will be notified.

### **Cookies**

Cookies are text files, used by your computer's browser, that store visitor data. Cookies are commonly used on the Internet and do not harm your system.

We currently use cookies to collate general management data which is used to plan enhancements to our services.

We make use of the following cookies, which are set to expire as detailed below:

Cookie Name	Description	Expiry
_ga	A google Analytics Tracking Cookie used to distinguish between users	2 years
_gat	A Google Analytics Tracking Cookie used to throttle request rates	24 hours
_gid	A Google Analytics Tracking Cookie used to distinguish between users	1 minute
CAKEPHP	A Cookie controller used to manage other Cookies	1 hour
Wfvt_72563704	Used to track user duration so that page views can be grouped together	30 minutes

Wordfence_verifiedHuman	Used to verify if the visitor is a human or a bot	1 minute
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**NOTE** – the cookies above refer to the cookies used by the centrally managed Vink UK websites and web shops.

If you do not want to accept cookies you may be able to configure your browser not to accept them. Please refer to your browser's 'help' facility for further information. Subject to specific regional European country laws you may be asked to consent to cookies via a cookie banner on the website. However, you should bear in mind that this may affect our ability to process the transactions you wish to have authorized. You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies, at: <https://www.aboutcookies.org/> (Note that UKAP does not control this website and is not responsible for its content. It is provided as information only. For the most current browser-specific information, please consult your browser's manufacturer).

### **Where we store your personal data**

Any data that you provide to us is normally stored, processed and maintained in a country within the European Union (**EU**). While it is not normal practice for UKAP to do so, data may be transferred to, and stored at, a destination outside the EU. In such cases we shall ensure that only countries, and / or third-party processors that are compliant with the EU regulations are used by using means prescribed by the EU - GDPR.

Similarly, data may also be processed by staff operating outside the EU who work for us or our associated service provider(s). Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We request that you do not share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect any personal data you give us, we cannot guarantee the security of your data transmitted from your terminal to our site.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access. These include:

- Hashing
- SSL-encryption
- ISO 27001

We also take appropriate steps, such as encrypted passwords and recovering passwords via email without direct passwords details, to verify your identity before granting access to your personal profile.

## **Disclosure of your information**

Regional companies in the Vink UK family may share your personal information for marketing purposes.

In order to further our legitimate interests, we may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If UKAP is, or substantially all of its assets are, acquired by a third party, in which case personal data held by it about its customers and suppliers and /or their employees will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us or our group, our customers and suppliers, or others.
- When furthering the legitimate interests of UKAP and its associated family of companies by exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

In all of the above cases we shall inform you that your personal information has been shared with a third party.

## **Your rights**

In terms of the EU- GDPR you have the following rights:

1. To be provided with details regarding the type of personal information being collected, processed and maintained
2. Rectification of incorrect personal information that has been collected and stored by UKAP
3. Subject to competing rights and legal obligations of UKAP, partial or complete erasure of your personal information because:
  - UKAP no longer needs the personal information for the purposes that it has collected
  - You wish to withdraw the consent that you gave for the personal information to be processed
  - If the processing is based on furthering our legitimate interest you may object to such processing. This objection will be weighed against our rights and legal obligations to further process the personal information.
  - The processing is unlawful
4. Restrict the processing of personal information because:
  - Of inaccuracies in the personal information
  - The processing is unlawful
  - UKAP no longer needs the personal information for the purposes that it has been collected
  - If the processing is based on furthering our legitimate interest you may object to such processing. This objection will be weighed against our rights and legal obligations to further process the personal information.
5. If the processing is based on furthering UKAP' legitimate interest you may request that such processing be ceased. This objection will be weighed against our rights and legal obligations to further process the personal information
6. Where the processing of personal information is based on furthering UKAP' legitimate interest, to download such personal information in digital format
7. Where the processing of personal information is based on consent, to withdraw such consent

You can exercise your right to prevent such processing by checking the relevant boxes on the online forms that we use to collect your personal data. You can also exercise the right at any time by contacting us directly.

Where we have shared your personal information in line with the provisions with this privacy policy, we shall take reasonable steps to inform all parties with whom we have shared the information of any request to have such personal information deleted.

Any of our websites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request will be dealt with free of charge.

#### **Changes to our privacy policy**

You will be notified of any changes that we may make to our Privacy Policy in the future.

#### **Queries and Complaints**

If you have any requests concerning your personal information, please contact our operations team by email to [sales@ukap.co.uk](mailto:sales@ukap.co.uk)

