



Waterman Group, Company Number 02188844

ICO notification number Z4663612

Registered Office: Pickfords Wharf, Clink Street, London, SE1 9DG

Privacy Policy / Data Protection Notice

Waterman Group respects your privacy and seeks to protect your personal data. The following information describes how we gather and use data. The amount of information Waterman Group holds on you and how it uses it depends on your relationship with Waterman Group and on what service you use, so some of the sections below may not be relevant to you.

- We keep to a minimum the amount of information we hold about you.
- We use your data to respond to your enquiries about our services (the lawful basis for this is “legitimate interest”) and to provide our services to you (the lawful basis for this is “Contract”).
- We delete your data when it is no longer needed.
- We apply appropriate security mechanisms to protect your personal data.

For the definition of terms used within this Privacy Notice refer to the [ICO website](#) or look at the General Data Protection Regulation (“GDPR”). We suggest you start with the ICO website.

We are happy to answer any questions you have about this Privacy Notice. Contact us via email on privacy@watermangroup.com.

FAQs

The following are basic questions you may have about our Privacy Policy. We encourage you to read the detailed statement below for additional details.

What information does Waterman Group collect about me?

We will collect personal information which you provide to us to ensure we provide the best possible service to you. We will use this data to communicate with you, for example, informing you about new products or services available from us.

We collect your name, phone number, email address, IP address, social identifiers, data provided by cookies and other similar technologies, functional data such as registration and system data, as well as additional usage data; for instance, purchasing preference and event or training attendance information.

By visiting our website, you agree to the use of cookies and similar technologies for the purposes described. Refer to the section on Online Activities within this Privacy Policy Notice.

Why does Waterman Group need my information?

We use the data to provide you with the best experience from the products and services we offer, which includes using data to improve and personalise your experiences. We also use the data to communicate with you, for example, informing you about new products or services available, security and other types of updates. Refer to the section on Contacting you via E-mail alerts, notices and newsletters within this Privacy Policy.

How is my information used?

We use the data for the following purposes:

- Product and Service Delivery and Improvement.
- Future product and service enhancement.
- Customer Support.
- Security, Safety, and Dispute Resolution.
- Communications and Marketing.

What are my rights as a data subject?

- **You have the right to opt out of communications.**
- **You have the right to the rectification of any incorrect data we hold about you.**
- **You have the right to object to us processing your information.**
- **You have the right to access any information we hold on you.**

You can exercise any of these rights by contacting us at privacy@watermangroup.com

How do I delete my personal data from Waterman Group and what are the consequences?

You can always send us an email to privacy@watermangroup.com or contact the Data Protection Manager on +44 207 928 7888 and request that your personal information be deleted. However, please note, by deleting your personal data you may impact the service we can provide you.

How long does Waterman Group keep my information?

We retain personal data for as long as necessary to provide Services, support your Product / Service and fulfil the transactions you have requested, or for other essential purposes such as complying with our legal obligations, and resolving disputes and enforcing our agreements. Because these needs can



vary for different data types in the context of different Products or Services, actual retention periods can vary significantly.

How is information stored?

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access, use or disclosure. For example, we store the personal data you provide on computer systems that have limited access and are in controlled facilities.

How we gather and use your information

Personal information is gathered in the following ways:

Your name and contact information, provided by you, will be used to respond to your enquiry, requests for further information, and to communicate with you during the provision of our services to you. Business contacts may be collected using forms on our website, or during the provision of our services and day-to-day correspondence with business contacts.

Waterman Group collects and updates information about users of its services. It may obtain this information via direct contact with you, from third parties such as other users and automatically via your use of our services.

This information includes your contact details, support problems, details around participation in events, surveys and certain relevant details of your preferences.

If you are a registered user of Waterman Group services, Waterman Group also gathers information about your use of our services, such as generic types of data accessed, times and volume of use of the services and Traffic Data from the use of our Website. Traffic Data includes logs, details of networks, data and systems accessed, details of the sender and recipients of messages sent over our services, times and location of log on or access, duration of sessions, clickstream and similar usage or system data. Traffic Data may sometimes be traceable to/related to not just companies but named individuals. Before you register with Waterman Group for access to membership areas of our website, you can browse Waterman Group websites anonymously.

Upon request we provide site visitors with access to all information including proprietary information that we maintain about them (but not other users unless required to do so by law) including unique identifier information (e.g. customer number or password) and contact information (e.g. name, address, phone number). Users can access this information by e-mailing or writing to us. Upon request we offer visitors the ability to have inaccuracies corrected by providing such correct details to Waterman Group or where available by changing their registered details online.



Waterman Group collects and uses your information to administer, support, improve and obtain feedback on our services and to detect and prevent faults, breaches of our network security, the law or our contract terms. If you are registered to use a service we may use the information you provide to us to carry out the service (please see the terms and conditions relating to that particular service) and we may contact you to obtain feedback on that service and any improvements we could make to it.

In addition to the information obtained via cookies on the website, information volunteered by the user such as CVs for vacancies, survey information and/or site registrations is also collected.

We also collect the e-mail addresses of those who communicate with us via e-mail.

The information we collect is used primarily for internal review and to improve the content of our Website & services. It is also used to notify users about updates to our services. This information is not shared with other organisations for commercial purposes. If you do not want to receive e-mail from us in the future, please let us know by sending an e-mail to privacy@watermangroup.com.

Whom do we share it with?

Waterman Group may work with its International offices and Suppliers in the provision of some of our services.

Waterman Group will provide you with details of which Suppliers will be involved as part of the agreement with you regarding the provision of any of our services. We will also discuss and agree on any specific security requirements you may have during the provision of our services.

All other third parties we use – including those who provide email and storage solutions used in our day to day work – are selected for, and monitored on, how they meet the requirements of current UK data protection legislation and the requirements of GDPR.

Exemptions to the above are where we are asked to provide information as a result of a court order or to recover monies due.

We do not share nor sell your personal data to anyone else.

How long do we store it for?

If you are a sole trader or partnership, financial transactions between us might include some personal data. We are required to keep this information for the current financial year plus an additional six years.

Waterman Group may store your information in its databases, such as its customer relationship database, for reference. The information may be retained and used by Waterman Group to answer queries or resolve problems, provide improved and new services and any data retention requirements

of the law. This means we may retain information after an individual ceases to use Waterman Group services or after the individual has ceased interacting with Waterman Group. Except where the law, authorities or regulatory bodies require us to retain it for longer, we retain Traffic Data after the Traffic Data was generated.

Whilst we store your information we store it securely to prevent unauthorised use.

Your Rights regarding our use of your personal data

You can review, edit or delete your personal data we hold by contacting us directly at privacy@watermangroup.com. You can also alter our collection and use of your data by contacting us to vary your communication and data usage preferences. **You will always have the right to opt out of receiving promotional emails and other types of marketing communication from us.**

We will respond to any request to access or delete your personal data as soon as possible, but certainly within 30 days.

You can opt out of receiving certain direct communications from Waterman Group. If you wish to stop receiving emails from us, you can do so by following the instructions included in every email sent to you via the "Unsubscribe" tab. We respect your choice, and we will stop sending you promotional emails once you unsubscribe. It may take up to one week to process your request. You can also make your choice by contacting us at privacy@watermangroup.com.

If there are any changes in your details that we need to reflect, you need to check the accuracy of the details that we hold about you, or if you have any other questions about this Privacy Notice, email privacy@watermangroup.com.

Should you feel that you need to complain about how we are handling your personal data, email privacy@watermangroup.com or use the 'Contact Us' form on our website.

Your ultimate point of contact for all data protection matters in the UK is the Information Commissioner's Office (see the [Contact us](#) page on the ICO website) or, for Ireland, the Data Protection Commission for Ireland (www.dataprotection.ie).

Contacting you via E-mail alerts, notices and newsletters

Waterman Group only sends marketing information to those that it believes it has a legitimate business interest to do so. Waterman Group offers the opportunity for you to receive an e-mail



newsletter or other notifications in relation to products and services being advertised on the Waterman Group website or new services being offered. You can at any time choose to stop receiving e-mail alerts or newsletters by following the instructions on the alert, notification or e-newsletter or by e-mailing privacy@watermangroup.com.

If you do receive unwanted email from us all our correspondence offers clear instructions on how to opt out. If you supply us with your postal address or telephone number you may receive periodic mailings or calls from us with information on new products and services or upcoming events. If you do not wish to receive such updates, please let us know by or e-mailing us at privacy@watermangroup.com.

Interception of mail

Waterman Group may intercept email addressed to individuals within Waterman Group. The reasons we do this are related to security of Waterman Group, its staff and others, for detection and prevention of crime and to identify correct recipients or to make sure mail is dealt with during staff absence. Waterman Group may reject, delay or remove content from emails which have a nature, content or attachments which may disrupt Waterman Group's systems or because they may pose security issues such as viruses.

Waterman Group may also filter out emails which contain certain content on the basis that content is offensive or the email is unwanted or spam. In certain circumstances this may unfortunately result in "innocent" emails being affected, but Waterman Group does try to reduce such occurrences.

Security

Waterman Group has developed strict policies governing information technology. These cover areas such as access control, authentication, audit, monitoring, alarms, data storage and back up and transmission standards and environment integrity. Waterman Group will use reasonable endeavours to install and have appropriate security measures in place in Waterman Group's facilities to protect against the loss, misuse or alteration of information that Waterman Group has collected from you at Waterman Group's site.

Online Activities

Cookies

"Cookies" are pieces of software, which may be sent and recorded on your computer. These cookies enable us to collect information about how our website is being used and to manage them more efficiently. These cookies help us to distinguish you from other users of our website. This helps us to provide you with a productive experience when you are on our website and enables us to target future improvements to the site.

Most cookies will not collect information that personally identifies you. They will collect more general information such as how you arrive at and use our website, or your general location.

You can turn off the ability to receive cookies by adjusting the Browser settings on your computer or portable device. If you are not sure how, visit www.aboutcookies.org which has full details on how to do this on all the industry-leading Browsers. Bear in mind changing this setting will impact on your experience on our website.

Google Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. ("Google") to help us understand website traffic and webpage usage. Google Analytics also uses cookies to help enable us to analyse how users use our site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, and compiling reports on this activity. 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. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For up to date details on how Google will process this information can be found here - policies.google.com/privacy

What if this privacy notice changes?

This Policy will change from time to time. The website will always contain our current Privacy Notice.

If changes to the Waterman Group plc Data Protection Policy (and hence this Privacy Notice) include any significantly different use of your personal data, we will let you know and give you the option to agree to the new use.



Right to access information

You have the right to access all personal information that is held by us. This is commonly referred to within the EU as a Subject Access Request. To request this information, please contact us at privacy@watermangroup.com.

Questions

If you have any questions about Waterman Group's privacy/data protection policy or the use of data in a particular service, you should write to Data Protection Manager, Waterman Group, Pickford's Wharf, Clink Street, London SE1 9DG.