



## OPERATIONAL SYSTEMS

### Privacy Statement

Reference: OS2610A

#### 1. INTRODUCTION

Oat Services Limited (“we”, “our” or “us”) is committed to protecting and respecting your privacy. This policy (together with 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.

We won’t publish, give, sell or rent our contact lists to anyone. We don’t abuse the trust you place in us when you send us an enquiry. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

The website <https://www.oat.co.uk/> is owned and operated by us (“site”).

Our site is not intended for children and we do not knowingly collect data relating to children.

The site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our site, we encourage you to read the privacy policy of every website you visit.

#### 2. INFORMATION WE MAY COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed i.e. anonymous data.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes: the full names and addresses of our customers and distributors and the job roles of distributors.
- **Contact Data** includes: billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes: bank account and payment card details.
- **Transaction Data** includes: details about payments to and from you and other details of products and services you have purchased from us.
- **Usage Data** includes information about how you use our site, products and services.

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- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes: your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

**3.1 Direct interactions:** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

**For customers and distributors:** this includes personal data you provide when you:

- make contact with us to request a quotation or other information about our products and services;
- place an order with us for yourself or on behalf of someone else;
- subscribe to our newsletter;
- request marketing to be sent to you;
- give us feedback or contact us; or
- collaborate with us on any projects.

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#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or distributor	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) advising you of product updates (c) to customize our CRM system and web content	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests

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To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Profile (c) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

#### Marketing

We may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You will receive marketing communications from us if you have requested information from us or have opted in when registering as a new contact to receive marketing information, including our monthly newsletter.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

When registering as a new contact an employee will question whether you wish to be included within our marketing materials. At this point you can object to being included. You can ask us or third parties to stop sending you marketing messages at any time.

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#### 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above.

**External third parties** such as:

- Service providers acting as processors based in the UK who provide IT and system administration services, accounting and bookkeeping services and delivery/courier services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- Other members of our distributor network if your enquiry relates to their territory.
- Third party platform providers (such as mailchimp and salesforce) whom store our customers' data or process marketing information.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### 7. INTERNATIONAL TRANSFERS

It is not our general practice to transfer your data outside of the United Kingdom.

The exceptions to this are:

- If we forward your query to a distributor based outside of the UK; and
- Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

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- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; and/or
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

#### 8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We hold a SSL Certificate on our web server to provide a secure session with browsers. This certificate protects your sensitive information such as usernames and passwords, keeping data between servers secure.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 9. DATA RETENTION

##### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see your rights below for further information.

#### 10. YOUR RIGHTS:

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Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this

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right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

#### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

#### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### Time Limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### 11. ACCEPTANCE AND CHANGES TO THIS PRIVACY POLICY

This privacy policy was last updated October 2021. We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

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By using this site, you signify your assent to this Privacy Statement. If you do not agree to this statement, please do not use our site.

#### 12. CONTACT US

Oat Services Ltd is a company registered in England and Wales with company number 4275710 and EORI Number: GB 782064426000.

Questions, comments and requests regarding this privacy policy should be addressed to our data protection officer: Victoria Sherwood via email to [vs@oat.co.uk](mailto:vs@oat.co.uk) or sent to 226 Bassett Avenue, Southampton, SO16 7FU.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>.

Whilst the privacy statement below covers the fine detail, we can sum it up here. We will respect and protect your privacy. We won't publish, give, sell or rent the Oat Services Ltd or Oat Cosmetics contact lists to anyone. We don't abuse the trust you place in us when you send us an enquiry.

This privacy statement tells you how we collect information from you and how we use it. This statement forms part of our web site Terms and Conditions and complies with GDPR Regulations.

The information you provide is used to make your visits to our site easy and enjoyable. Be assured that Oat Services Ltd will not disclose your personal information to third parties without your consent. However, we reserve the right to disclose user information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) Oat Services Ltd's rights or property, other users, or anyone else who could be harmed by such activities.

Oat Services Ltd collects aggregate information about our subscribers and web visitors. This data is used to customise Oat Services Ltd CRM and web content to deliver a better experience for our users and will in no way personally identify you. Your information will not be passed onto a third party.

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We do request personal information such as your name, job title, company details, telephone numbers and email addresses, etc when you subscribe to our newsletters or send us a message from our contact form. We need to collect this information for personalisation and delivery and/or for purposes of editorial content with your consent.

Furthermore, we may use your personal information to send you periodic Oat Services Ltd or Oat Cosmetics communications, solicit your feedback on Oat Services Ltd or Oat Cosmetics issues, provide you with special Oat Services Ltd or Oat Cosmetics offers, or for other Oat Services Ltd or Oat Cosmetics purposes and to customize the services we provide to you with your consent. If you choose to opt out of receiving any communications from us, please follow our unsubscribe process at the foot of any message we may send you. Your information will not be passed onto a third party

#### Security

Protecting the security of all personally-identifiable information associated with our guests is of the utmost concern to us. We exercise great care in providing secure transmission of your information from your PC to our servers. We hold a SSL Certificate on our web server to initial a secure session with browsers. This certificate protects your sensitive information such as usernames and passwords, keeping data between servers secure.

You should be aware that when you are on the oat.co.uk /oatcosmetics.com web site, you could be directed to other sites that are beyond our control. There are links to other sites from oat.co.uk web site pages that take you outside our service. These other sites may send their own cookies to users, collect data or solicit personal information. The privacy policies of these other sites may significantly differ from those of Oat Services Ltd. We are not responsible for the privacy practices of any other sites and cannot guarantee the security of any of your personal information collected there. Our web site does not have a tracking system in place.

Our CRM system has robust privacy and security protection and complies with GDPR regulations.

#### Privacy policy for minors

Oat Services Ltd does not knowingly collect information from minors. If you are under 18, please do not provide any personal information to us.

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#### Access to your own data

To be provided with a copy of your own personal data that we hold, and to contest and correct inaccuracies, or request that personal data be deleted, please contact us and we will respond quickly. To unsubscribe from Oat Services Ltd or Oat Cosmetics newsletters, simply use the unsubscribe link provided.

#### Your acceptance of these terms

By using this site, you signify your assent to the Oat Services Ltd Privacy Statement. If you do not agree to this statement, please do not use this site. The terms of this Privacy Statement may change from time to time without prior notice to you, so please check this page periodically for any changes. Your continued use of this site following the posting of changes to these terms will mean you accept all changes.

Date	Revision Number	Notes
19/04/18	1	Document Creation
19/01/22	2	Updated following review with Paris Smith

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