



## PRIVACY POLICY

Westbury Street Holdings Limited ("We") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We keep certain basic information when you visit our website and recognise the importance of keeping that information secure and letting you know what we will do with it.

For the purpose of the Data Protection Act 1998 (the **Act**), the data controller is Westbury Street Holdings Limited of The Waterfront, 300 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT company registration number 07523520.

This policy applies to all sites under the Westbury Street Holdings Limited Group:

BaxterStorey Ltd, The Waterfront, 300 Thames Valley Drive, Reading, Berkshire. RG6 1PT, company registration number 01962583

Caterlink Ltd, The Waterfront, 300 Thames Valley Drive, Reading, Berkshire. RG6 1PT, company registration number 03732298

Portico CRM Ltd, The Waterfront, 300 Thames Valley Drive, Reading, Berkshire. RG6 1PT, company registration number 05159876

Holroyd Howe Ltd, The Waterfront, 300 Thames Valley Drive, Reading, Berkshire. RG6 1PT, company registration number 03319291

Benugo Ltd, The Waterfront, 300 Thames Valley Drive, Reading, Berkshire. RG6 1PT, company registration number 03505757

If you leave our site via a link or otherwise, you will be subject to the policy of that website provider. We have no control over that policy or the terms of the website and you should check their policy before continuing to access the site.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on any of our sites:

<http://www.wshlimited.com/>

<http://www.baxterstorey.com>

<http://www.caterlinkltd.co.uk/>

<http://holroydhowe.com/>

<http://www.portico.co.uk/>

<http://www.benugo.com/>

This includes information provided at the time of registering to use our site, subscribing to our service or requesting further services. We may also ask you for information when you report a problem with our site.

- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs, operating system, browser usage and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

## IP ADDRESSES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual and we will not collect personal information in this way.

## **COOKIES**

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer.

A cookie is a small file which is placed on your hard drive when you visit our websites (directly or via our applications). We use information from cookies for purposes which may include:

- identifying returning users, registrants and subscribers
- eliminating the need for returning users to re-enter their login details
- enabling you to move more easily around our sites and applications
- tracking your use of our sites to better develop our sites and applications in accordance with your requirements
- building up an anonymous profile based on your browsing patterns across our sites, applications and third party websites, which enables us to make advertisements and content available to you that is more relevant to your interests

You can delete cookies from your hard drive at any time. Bear in mind, though, that if you delete them, any settings such as your stored username and password will have to be reset when you next log in.

You will be able to use our websites and applications even if your browser is not set to accept cookies. However, certain features and content may not be available to you and you will have to log in every time you visit. By visiting our website, you consent to the use of cookies as explained above.

## **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

*All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. 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 ask you not to 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 your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access

## **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- 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 carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

*We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by [post or telephone].*

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data.

## **DISCLOSURE OF YOUR INFORMATION**

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 we are under a duty to disclose or share your personal data in order to comply with any legal obligation, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **YOUR RIGHTS**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at The Waterfront, 300 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT.

Our site 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.

## **ACCESS TO INFORMATION**

The Act 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 may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. However, we advise that you check this page regularly to keep up to date with any necessary changes.

## **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Westbury Street Holdings Limited, The Waterfront, 300 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT.