

## Welcome to Way Forward Solutions Limited's Privacy Notice

Way Forward Solutions Limited respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Notice.

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### 1. IMPORTANT INFORMATION AND WHO WE ARE

We at Way Forward Solutions Limited are committed to protecting your personal data and maintaining your trust and confidence. In particular, we want you to know that Way Forward Solutions Ltd is not in the business of selling, renting or trading email lists with other companies and businesses for marketing purposes. We just don't do that sort of thing. But, to reassure you further, in this Privacy Notice we've provided for you a lot of detailed information on when and why we collect and store your personal information, how we use it and the very limited conditions under which we might disclose it to others and how we keep it secure. Time to sit back, relax and read on. We're fierce about providing you a service and respecting and maintaining your privacy.

### PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice aims to give you information on how Way Forward Solutions Limited collects and processes your personal data including any data you may provide through this website and when you sign up to our newsletter, purchase a product or service or take part in any competition or Event we host.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### CONTROLLER

Way Forward Solutions Limited is the controller and is responsible for your personal data. If you have any questions about how we use your data you can contact us using the details below.

## CONTACT DETAILS

Our full details are:

Full name of Legal Entity: Way Forward Solutions Limited

Name or Title Founder & Data Privacy Manager: Kay White

Email address: support@kaywhite.com

Postal address: Kay White, Way Forward Solutions Limited, 3 London Wall, London EC2M 5SY

Telephone number: +44 (207) 631 0554

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us directly in the first instance.

## CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 23 May 2018 and historic versions can be obtained by contacting us.

The data protection law in the UK will change on 25 May 2018. Although this Privacy Notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website may sometimes 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 website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE 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 (anonymous data).

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

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- 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.

- 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.
- Usage Data includes information about how you use our website, products and services.

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.

As part of the registration process for our bi-monthly e-newsletter and complimentary recordings, we collect personal information. We use that information for a couple of reasons: to tell you about information you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses.

We use a third-party provider, 1ShoppingCart, to deliver our Newsletter (or eZine). We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, [please see 1ShoppingCart's Privacy Policy](#). You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our assistant data protection officer – click here for direct email to [Helen Slater](#).

#### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

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

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

- **Direct interactions.** You may give us your name, email and occasionally address/financial details by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - register for an event
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
- Please see our **cookie policy** for further details.

#### 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 or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us or unsubscribing using the specific link at the bottom of any email sent via 1ShoppingCart.

#### 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.

<b>Purpose/Activity</b>	<b>Type of Data</b>	<b>Lawful basis for Processing including basis of legitimate interest</b>
To register you as a new contact or customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a	(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 (to keep our records updated and to study how customers use our products/services)

review or take a survey		
To enable you to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and Communications</li> <li>(f) Technical</li> </ul>	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>(a) Technical</li> <li>(b) Usage</li> </ul>	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website 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	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> <li>(d) Usage</li> <li>(e) Profile</li> </ul>	Necessary for our legitimate interests (to develop our products/services and grow our business)

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Please email [Helen Slater](#) for information on what we hold or if you no longer wish to receive certain marketing or advertising materials.

## PROMOTIONAL OFFERS FROM US

We may use your identity, contact, technical, usage and profile 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 (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion or an event - and, in each case, you have not opted out of receiving that marketing.

## OPTING OUT

You can ask us to stop sending you marketing messages at any time by contacting us at any time via email to [Helen Slater](#).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions. There is – and always has been – an ‘Unsubscribe’ button at the bottom of every automated email which comes to you. Use this to Unsubscribe and your details will be removed from our client relationship management system via 1ShoppingCart.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Our website uses cookies to collect information. This includes information about your browsing and purchasing behaviour - this includes information about pages viewed, products purchased and your journey around our website. Detailed information is [set out in our Cookie Policy](#).

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

- DISCLOSURE OF YOUR PERSONAL DATA** We may need to share your data with the third parties set out below for the purposes set out at paragraph 4 above. 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 namely: **1Shoppingcart Group, Solamar Marketing Inc, PayPal, Global Payments Inc.**

## 6. INTERNATIONAL TRANSFERS

We share your personal data within the [1Shoppingcart Group](#) and [Solamar Marketing Inc](#) to enable our emails to reach you. This will involve transferring your data outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA, we will always do so either (i) with your informed consent, or (ii) where it is necessary for the performance of our contract with you or to take pre-contractual steps at your request, or (iii) where we need to in order to perform a contract we have with another company or individual which we have entered into for your benefit. We will always seek to ensure that when your data is transferred out of the EEA it has a similar degree of protection afforded to it. For example, where our providers are based in the US, we will seek to ensure that your data is processed by organisations which have the benefit of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US (for further details, see [European Commission: EU-US Privacy Shield](#)). If this is not possible, we will seek to ensure that there are alternative adequate safeguards in place to protect your data.”

[Please Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA .

## 7. 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 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.

## 8. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 6 years after they cease being customers for accounting/tax purposes.

In some circumstances you can ask us to delete your data: [Request Erasure](#)

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research, teaching or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. [Please email us to](#) find out more about these rights to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please [contact Helen Slater](#)

### 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 may 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 calendar month. Occasionally it may 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.

## 10. GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities [by contacting us: Helen Slater](#)

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### EXTERNAL THIRD PARTIES

- Service providers [1shoppingcart](#) or [Solamar Marketing](#) based the USA who provide IT and system administration services
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

## YOUR LEGAL RIGHTS

You have the right to:

**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: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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 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.