

## Privacy Policy

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://bwww.co.uk/> (“the Site”) and using the services we provide via the Site, you are accepting and consenting to the practices described in this policy.

B.W.W. BEST WAY WORLDWIDE UK LIMITED (“we/us/our”) is committed to protecting and respecting your privacy and your personal data.

Our privacy policy is designed to give you useful information about the ways in which we collect, store, use your details and do so in a way that does not infringe your right to privacy. We are very conscious of the obligations imposed on us in terms of the law.

The Site 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 notice(s) or policies we may provide on specific occasions. This privacy notice supplements the other notices and is not intended to override them.

The data controller is B.W.W. BEST WAY WORLDWIDE UK LIMITED with the registered office address at 63-66 Hatton Garden, Fifth Floor Suite 23, London, England, EC1N 8LE. We are responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO at [info@bwww.co.uk](mailto:info@bwww.co.uk).

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 in the first instance.

### **Information we may collect from 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, store and process the following data about you:

- **Information you give us.** Upon registration, use, ordering services, subscribing to our database, reporting problem with the Site you may give us information about you by interacting with our Site, filling in forms on the Site or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, address, billing address, e-mail address and phone number, username, password or similar identifier, your title, company name, country, and financial, bank account, payment and credit card information, identification documents (such as your passport and utility bills), amongst other information.
- **Information we collect about you.** We may retain a record of your correspondence with us, your interests, preferences, feedback and survey responses, and details of any transactions you carry out through the Site (including details about payments to and from you and other details of products and services you have purchased from us). With regard to each of your visits to the Site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, 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 the Site;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time).
- **Information we receive from other sources.** We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) who are based inside the EU and outside and we may receive information about you from them in the due course of such information transfer. We may also receive personal data about you from various public sources.

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.

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 products or services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

If you want to modify or update any of your personal data or you want to access the information we retain about you, please contact us, and we will provide you with it.

## **Cookies**

The Site uses cookies, such as strictly necessary cookies for the provision of the services, analytical cookies, functionality cookies and targeting cookies to distinguish you from other users of the Site. This helps us to provide you with a good experience when you browse the Site and/or order services and also allows us to improve the Site.

Our Site places and accesses first party cookies on your computer or device (i.e. placed directly by us). Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies on our Site, over which we have no control. These cookies are likely to be analytical/performance or targeting cookies. We may also use third party cookies to help us with market research, revenue tracking, improving Site functionality and monitoring compliance with our terms and conditions.

If you do not wish for cookies to be installed on your device, you can block cookies by activating or changing the settings on your browser that allows you to refuse the setting of all or some cookies.

## **Uses made of the information**

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 other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us (see details below).

We use information held about you in the following ways:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us, including carrying out work on your instructions;
- to verify your identity and to protect, investigate, and deter against fraudulent, unauthorised, or illegal activity, including identity fraud;
- to manage our relationship with you, including by maintaining our database of contacts, notifying you about changes to our terms of use and/or privacy policy and asking you to leave a review or take a survey;
- to comply with our legal, professional and regulatory obligations;
- to keep in contact with you about our news, new Site features, and services that we believe may interest you, provided that we have the requisite permission to do so;
- to administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep the Site safe and secure;
- to provide access to and improve the Site to ensure that content is presented in the most effective manner for you and for your computer;
- to respond to enquiries you make, in particular when you make inquiries about the provision of our services to you;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to use data analytics to optimising the use of our Site, to improve our Site, products/ services, marketing, customer relationships and experiences;
- to make suggestions and recommendations to you and other users of the Site about goods or services that may interest you or them.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us if you have requested information from us or purchased products or services from us and, in each case, you have not opted out of receiving that marketing.

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

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time (see contact details below). 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, or other transactions.

## **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 (see details below). 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 information**

In connection with the purposes and on the lawful grounds described above, we may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

In connection with the purposes and on the lawful grounds described above, we may also share your information with relevant third parties including:

- Business partners, suppliers, service providers and sub-contractors for the performance of any contract we enter into with them or you. They act as processors and provide us with:
  - website development and hosting services based inside&outside the EU
  - IT, system administration and security services based inside&outside the EU
  - identity verification, fraud prevention and detection services based inside&outside the EU
  - governmental bodies and other authorities acting as processors or joint controllers based in the United Kingdom, who require reporting of processing activities in certain circumstances
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others and that you have consented to our sharing your information with for marketing purposes.
- Analytics and search engine providers that assist us in the improvement and optimisation of the Site.

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 B.W.W. BEST WAY WORLDWIDE UK LIMITED or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers 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 Website Terms of Use and other agreements; or to protect the rights, property, or safety of B.W.W. BEST WAY WORLDWIDE UK LIMITED, our customers, employees or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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. Other than in the circumstances outlined above, we will not pass on your personal information to any third parties.

### **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 enquiries, the processing of your payment details and/or the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Your personal data is transferred to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries;
- Your personal data is transferred to recipients on the basis of specific contracts approved by the European Commission which give personal data the same protection it has in

Europe. For further details, European Commission: Model contracts for the transfer of personal data to third countries; and

- Your personal data is transferred to recipients based in the US that are part 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.

Please contact us (see details below) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the 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 the 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. 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.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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 requirements.

### **Your rights**

- **Under certain circumstances, you have rights under data protection laws in relation to your personal data, including:**
- the right to be informed about our collection and use of your personal data;
- the right to request access to, deletion of or correction of, your personal data held by us;
- the right to complain to a supervisory authority;
- be informed of what data processing is taking place;
- the right to restrict (i.e. prevent) the processing of your personal data;
- the right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- the right to object to us using your personal data for particular purposes;
- rights with respect to automated decision-making and profiling.

You may exercise your rights above by contacting us using the contact details below and we will comply with your request unless we have a lawful reason not to do so. 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.

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.

We try to respond to all legitimate requests within one 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.

### **Links**

The 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 this may allow those third parties to collect or share data about you. Please note that these websites have their own privacy policies and that we do not control or accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **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, notify you of any materials changes by e-mail. Please check this page frequently to see any updates or changes to our privacy policy.

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.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@bwww.co.uk](mailto:info@bwww.co.uk).