



OCEALA LIMITED (“The Company”)

PRIVACY NOTICE FOR CUSTOMERS AND SUPPLIERS

What is the purpose of this document?

The Company is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you. It provides you with certain information that must be provided under the **General Data Protection Regulation (GDPR)**.

This Privacy Notice is relevant to you if you are a contact from one of our customers or suppliers or a contact that may do business with the Company from time to time. As a result, from time to time we may collect certain personal information about you.

The Company is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.

The Company's contact details are as follows:

Oceala Limited (company number 01669351) Feldspar Close, Warren Industrial Park Enderby, Leicester, LE19 4SD. Telephone number: 0116 2867772

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.



The kind of information we hold 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 will collect, store, and use the following categories of personal information about you:

- Your name
- Your business email address
- Your work address
- Your job title
- Your business telephone number (which may include your mobile number)
- Your LinkedIn profile and details
- CCTV images should you visit our premises
- Details of communications we may have with you on the telephone (including SMS messages), in person or by email

How is your personal information collected?

We will normally collect information about you from our day-to-day business dealings and communications with you. Any personal information collected will generally only relate to you as a contact/customer/supplier of the Company

How we will use information about you

We will only use your personal information we collect about you to contact you in accordance with our legitimate interests as a business and to perform any contract we may have with you or your business or otherwise to comply with our legal obligations. We may need to use your personal information to defend or bring legal proceedings. We will also use your personal information to keep a record of our communications (by telephone, email or face-to-face) as part of our legitimate interests.

If you fail to provide personal information

If you fail to provide information when requested, we may not be able to communicate with you or transact business with you or your business.



Automated decision-making

You will not be subject to any automated decision-making.

Data sharing

We may have to share your data with third parties. We will only do so if this is part of our legitimate interests, if requested by you, or if required as part of defending or pursuing legal proceedings, or if required by law.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

Data retention

How long will you use my information for?

We will only keep your personal information for as long as is necessary for the purposes for which we have collected it. We operate a Data Retention Policy and Schedule that sets out the criteria we consider when retaining personal data. The criteria will vary dependant on the information we keep but will generally be retained on the following criteria:

- How long we need to keep such information for the purposes of our legitimate interests (to record meetings, appointments and communications with you) and/or for the purposes of performing any contract with your business.



- Any limitation periods existing for pursuing any claims against us or in respect of claims we may need to bring.
- Any periods otherwise prescribed by law.

Your individual rights

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Elizabeth Mott, Compliance Manager in writing at the Company's address set out above.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Person responsible for data protection in the Company

We have appointed Tim Cole, Financial Accountant to oversee data protection compliance within the Company. If you have any questions about this privacy notice or how we handle your personal information, please contact Tim Cole at the Company's address appearing above. 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.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact Tim Cole or Elizabeth Mott.