



## Head Office & NDC

15 Bruntcliffe Avenue, Leeds 27 Ind Estate  
Morley, Leeds, West Yorkshire LS27 0LL

[www.rw-wholesale.co.uk](http://www.rw-wholesale.co.uk)

# RW Refrigeration Wholesale Privacy Notice

### **Who We Are**

RW Refrigeration Wholesale Limited ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

RW Refrigeration Wholesale's registered office is at 15 Bruntcliffe Avenue, Leeds 27 Industrial Estate, Morley, Leeds, LS27 0LL and we are a company registered in England and Wales under company number 3453694 We are registered on the Information Commissioner's Office Register registration number ZA329565, and act as the data controller. Our designated Data Protection Representatives for the organisation are Gareth Duffin and Rachel Wenman, who can be contacted at [gdpr@beijerref.co.uk](mailto:gdpr@beijerref.co.uk).

### **Information That We Collect**

RW Refrigeration Wholesale processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

### **The personal data that we collect from is: -**

- Name
- Account number
- Company name
- Address
- Email address – business and personal
- Telephone number – business and home
- Mobile telephone number – business and home
- Website
- IP address
- VAT registration number
- F Gas certificate number
- Company registration number
- Passport number
- Bank details
- Credit card details
- Human images (via CCTV)
- Agency staff data
  - Name
  - Telephone number
  - Driving licence information
  - Relevant training documentation
  - Induction material
  - Attendance record
- Arrangements for travel:
  - Passport information
  - Date of birth



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## **We collect information in the below ways: -**

- Email
- Fresh Desk email
- Fax
- Form
- Letter
- Telephone
- Attendance at events
- Business cards
- CCTV

## **How We Use Your Personal Data**

RW Refrigeration Wholesale takes your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address, for example:
  - Opening credit account
  - Credit checks
  - Debt collection
  - Director guarantees
  - Insurance
  - Invoicing / statements
  - Payments
  - Purchases
  - Sales
  - Health and safety
  - Security
  - Cylinder tracking
  - F Gas registration
  - Website logins
  - Technical process
  - Warranty claims
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We will occasionally send you marketing information (via email, post or telephone) where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests (for example, special offers, product information, company updates, etc). You have the right to be removed from the mailing list at any time -please email your request to [gdpr@beijerref.co.uk](mailto:gdpr@beijerref.co.uk).

## **Your Rights**

You have the right to access any personal information that RW Refrigeration Wholesale processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with data protection laws, as well as to object to any direct marketing from us, to exercise your data portability rights and to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before



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acting on the request, this is to ensure that your data is protected and kept secure.

### Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. RW Refrigeration Wholesale uses third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

| Organisation Name            | Reason for processing                 |
|------------------------------|---------------------------------------|
| AIB Merchant Services        | Credit card processing                |
| Central Mailing Services     | Postal marketing                      |
| Charles BW Boyle & Son       | Debt collection                       |
| Couriers – various           | Deliveries                            |
| Credit Safe Ireland          | Credit checks                         |
| Equinox Global               | Credit insurance                      |
| First Data Global            | Credit card processing                |
| Freshworks                   | Email ticketing                       |
| Global Payments              | Credit card processing                |
| JAM                          | Emergency call out provider           |
| LA Design Practice           | Marketing & social media              |
| Lloyds Bank                  | Banking services                      |
| Mailchimp                    | Marketing                             |
| Nordea Bank                  | Banking services                      |
| Pannone Corporate LLP        | Solicitor                             |
| PricewaterhouseCoopers LLP   | Financial auditor                     |
| Security companies – various | CCTV – security and health and safety |
| Small World Systems          | Website logins                        |
| Suppliers - various          | Cylinder tracking / sales support     |
| Synertec                     | Processing of invoices / statements   |
| Ulster Bank                  | Banking services                      |
| Zoomgo                       | Marketing and web services            |

### Safeguarding Measures

RW Refrigeration Wholesale takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

- Web filtering
- Email protection
- Restrictions /permissions
- Antivirus and encryption
- Protected Wi-Fi
- Password protection
- SSL websites
- IT authentication
- Device restriction
- IT monitoring

### Transfers Outside the EU

RW Refrigeration Wholesale utilise some products or services (or parts of them) that may be hosted/stored in the USA and Australia, which means that we may transfer any information which is submitted by you through the website outside the European Economic Area ("EEA") for the below purposes: -



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- Website hosting
- Email servers
- Marketing database

Therefore, when you use our website/send us an email/sign up to our newsletter etc., the personal information you submit may be stored on servers which are hosted in the USA and Australia. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by RW REFRIGERATION WHOLESALE to protect your data and comply with the relevant data protection laws.

### **Consequences of Not Providing Your Data**

You are not obligated to provide your personal information to RW Refrigeration Wholesale, however, as this information is required for us to provide you with our services/deliver your products/legitimate interests, we will not be able to offer some/all of our products or services without it.

### **Legitimate Interests**

We occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we ensure that we have weighed your interests and any risk posed to you against our own and that such interests are proportionate and appropriate.

### **How Long We Keep Your Data**

RW Refrigeration Wholesale only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 7 years after which time it will be destroyed. All other information will be retained for a period of 7 years from end of contract or date of processing, excluding agency staff and health and safety information which will be retained for 3 years and CCTV images which will be retained for 30 days.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and / or withdraw your consent.

### **Special Categories Data**

Owing to the services that we offer, RW Refrigeration Wholesale sometimes needs to process sensitive personal information (known as special category data) from you, to arrange travel or insurance. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so. Where we rely on your consent for processing special category data, we will obtain your explicit consent through a signature/explicit mechanism. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

### **CCTV**

We have installed CCTV systems in our premises which are used by members of the public, for the purposes of public and staff safety and crime prevention and detection.

Images captured by CCTV will be kept for no longer than is necessary. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

You have the right to see CCTV images of yourself and be provided with a copy of the images.

We will only disclose images to other authorised bodies who intend to use it for the purposes stated above. Images will not be released to the media or placed on the internet for public viewing.

We operate CCTV and disclose in accordance with the codes of practice issued by the Information Commissioners Office (ICO).

### **Lodging a Complaint**

RW Refrigeration Wholesale only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

**RW Refrigeration Wholesale Ltd**  
**Gareth Duffin and Rachel Wenman**  
**15 Bruntcliffe Avenue, Leeds 27 Industrial Estate,**  
**Morley, Leeds, LS27 0LL**  
**Tel. 0113 201 2808 and 01372 389221**  
**Email gdpr@beijerref.co.uk**

**Information Commissioner's Office**  
**Wycliffe House, Water Lane, Wilmslow,**  
**Cheshire, SK9 5AF**  
**Tel. 0303 123 1113**  
**Email [registration@ico.org.uk](mailto:registration@ico.org.uk)**  
**or [casework@ico.org.uk](mailto:casework@ico.org.uk)**



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