

**Tactical Fulfilment Solutions Limited
Data Processor
Privacy Notice**

18th May 2018

Introduction

Welcome to the Tactical Fulfilment Solutions Limited (Tactical) Data Processor Privacy Notice.

Tactical respects privacy and is committed to protecting personal data.

This Data Processor Privacy Notice will inform you as to how we look after personal data which is supplied to us by our Customer (the Data Controller) and tell you about privacy rights and how the law protects the data subject.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Tactical processes personal data for the Performance of Contract with our Customers (the Data Controller).

Our services are not intended for children and we do not knowingly process any 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 processing personal data. This privacy notice supplements the other notices and is not intended to override them.

Tactical as a Data Processor

Tactical (the Data Processor) provide fulfilment services for the Performance of Contract with our Customers (the Data Controller).

Our use of data is limited only to the performance of fulfilment related activities in accordance with our Customers instructions and in all cases for which our Customers (the Data Controller) have obtained the necessary consents for their intended use of the 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 using the details set out below.

Contact details

Data Protection Officer, Tactical Fulfilment Solutions Limited, 85-87 Holspur Lane, Wooburn Green, Bucks HP10 0AU. Telephone: 01628 533500. Email: dpo@xwfms.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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO.

Changes to the privacy notice and the duty to inform us of changes

This version (Issue No. 1) was last updated on 18th May 2018. Where applicable previous versions of this privacy notice can be obtained by contacting us at the above address.

It is important that the personal data that we process on instruction from our Customers (the Data Controller) is accurate and current. Data subjects should keep our Customers (the Data Controller) informed if their personal data changes during their relationship with them. It is the

duty of our Customers (the Data Controller) to supply us with up to date and accurate personal data for processing in accordance with their instructions.

2. The data we collect and how we use personal data

As a Data Processor we do not routinely collect, use or store personal data other than for the Performance of Contract with our Customers (the Data Controller).

The purposes for which we will use personal data are for the Performance of Contract with our Customers (the Data Controller).

3. Marketing

We do not use any personal data received from our Customers (the Data Controller) for any marketing activity other than for the Performance of Contract with our Customers (the Data Controller).

4. Disclosures of your personal data

We may have to share personal data with third parties for the Performance of Contract with our Customers (the Data Controller) including Internal Third Parties and External Third Parties.

We require all third parties to respect the security of personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use personal data for their own

purposes and only permit them to process personal data for specified purposes and in accordance with our instructions.

5. International transfers

We are occasionally required to share personal data outside the European Economic Area EEA for the Performance of Contract with our Customers (the Data Controller).

Whenever we transfer personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that we use only known suppliers and that we have the appropriate Data Processing Agreements in place.

Please contact us if you would like further information on the specific mechanism used by us when transferring personal data out of the EEA.

6. Data security

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process 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 our Customers (the Data Controller) and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

We will only retain personal data for as long as necessary for the Performance of Contract with our Customers (the Data Controller), including for the purposes of satisfying our contractual obligations to our Customers (the Data Controller) and any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider our contractual obligations to our Customers (the Data Controller), the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our Customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being Customers and may be required to process such information to comply with a legal or regulatory obligation.

Our Customers (the Data Controller) can contact us to request us to delete the personal data that they have supplied to us.

8. Legal rights

The data subject has rights under data protection laws in relation to their personal data and should in the first instance contact the appropriate Data Controller should they wish to exercise their rights.

9. Glossary

LAWFUL BASIS

Performance of our Contract

Means processing personal data where it is necessary for the performance of a contract with our Customers (the Data Controller).

Comply with a legal or regulatory obligation

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

THIRD PARTIES

Internal Third Parties

Other companies in the Tactical Group acting as joint Data Processors who provide fulfilment and complimentary services.

External Third Parties

- Service providers acting as Data Processors who provide fulfilment and complimentary services.
- Professional advisers acting as Data Processors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as Data Processors or based in the United Kingdom who require reporting of processing activities in certain circumstances.

LEGAL RIGHTS

Where Tactical are operating as the Data Processor it is incumbent on our Customers (the Data Controller) to ensure the data subject's legal rights are upheld as stated below;

Request access

To their personal data commonly known as a "data subject access request". This enables them to receive a copy of the personal data held about them and to check that it is being lawfully processed.

Request correction

Of the personal data that is held. This enables them to have any incomplete or inaccurate data held corrected.

Request erasure

Of personal data. This enables them to ask for personal data to be deleted or removed where there is no good reason for it to continue to be processed. They also have the right to ask to delete or remove personal data where they have successfully exercised their right to object to processing, where information has been processed unlawfully or where there is a requirement to erase personal data to comply with local law.

Object to processing

Of their personal data where there is reliance on a legitimate interest (or those of a third party) and there is something about their particular situation which makes them want to object to processing on this ground as they feel it impacts on their fundamental rights and freedoms. They also have the right to object where their personal data is being processed for direct marketing purposes.

Request restriction of processing

Of their personal data. This enables them to ask for the processing of their personal data to be suspended in following scenarios: (a) if they want to establish the data's accuracy; (b) where use of the data is unlawful but they do not want it erased; (c) where they need the data held even if no longer required if needed to establish, exercise or defend legal claims; or (d) they have objected to use of their data but it is required to verify whether there are overriding legitimate grounds to use it.

Request the transfer

Of their personal data to themselves or to a third party. They will be provided, or a third party of their choice, their personal data in a structured, commonly used, machine-readable format.

Withdraw consent at any time

Where consent is relied on to process their personal data. However, this will not affect the lawfulness of any processing carried out before they withdraw their consent. If they withdraw your consent, it may not be possible to provide certain products or services to them and they will be advised of this at the time of withdrawing consent.

Issue No	Description of change	Approval	Date of Issue	Date to review