

PRIVACY POLICY

This privacy policy applies between you, the User of this Website and Morris Commercial Limited, the owner and provider of this Website. Morris Commercial Limited takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website (regardless of where you visit it from).

Please read this privacy policy carefully.

You can download a pdf version of the policy. Please also use the Definitions and interpretation to understand the meaning of some of the terms used in this privacy policy.

Purpose of this privacy policy

This privacy policy aims to give you information on how Morris Commercial Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to Morris Commercial Limited (including Personal Data) via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws. It does not include data where the identity has been removed (anonymous data);
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);
Data Protection Laws	any applicable law relating to the processing of Personal Data, including but not limited to the Data Protection Act 2018, the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
GDPR	the General Data Protection Regulation (EU) 2016/679;

Morris Commercial Limited, we or us	Morris Commercial Limited, a company incorporated in England and Wales with registered number 09856196 whose registered office is at ECOCAMPUS, Station Road, Hinton-On-The-Green, Worcestershire, WR11 2QU;
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
User or you	any third party that accesses the Website and is not either (i) employed by Morris Commercial Limited and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Morris Commercial Limited and accessing the Website in connection with the provision of such services.
Website	the website that you are currently using, www.morris-commercial.com, and any sub-domains of this website unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:
 - a. the singular includes the plural and vice versa;
 - b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
 - c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
 - d. "including" is understood to mean "including without limitation";
 - e. reference to any statutory provision includes any modification or amendment of it;
 - f. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

3. This privacy policy applies only to the actions of Morris Commercial Limited and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
4. For purposes of the applicable Data Protection Laws, Morris Commercial Limited is the "Data Controller". This means that Morris Commercial Limited determines the purposes for which, and the manner in which, your Data is processed.

Data collected

5. We may collect the following Data, which includes personal Data, from you:
 - a. name;

- b. date of birth;
 - c. job title;
 - d. profession;
 - e. Financial Data including payment card details.
 - f. contact information such as email addresses and telephone numbers;
 - g. demographic information such as postcode, preferences and interests;
 - h. IP address (automatically collected);
 - i. web browser type and version (automatically collected);
 - j. operating system (automatically collected) and other technology on the devices you use to access this Website;
 - k. Usage data which includes information about how you use this Website;
 - l. a list of URLs starting with a referring site, your activity on this Website, and the website you exit to (automatically collected);
- in each case, in accordance with this privacy policy.

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.

How we collect Data

- 6. We collect Data in the following ways:
 - a. data is given to us by you; and
 - b. data is collected automatically; and
 - c. Third parties or publicly available sources

Data that is given to us by you

- 7. We will collect your Data in a number of ways, for example:
 - a. when you contact us through the Website, by telephone, post, e-mail or through any other means;
 - b. when you register with us and set up an account to receive our products/services;
 - c. when you complete surveys that we use for research purposes (although you are not obliged to respond to them);
 - d. when you enter a competition or promotion through a social media channel;
 - e. when you make payments to us, through this Website or otherwise;

f. when you elect to receive marketing communications from us;
in each case, in accordance with this privacy policy.

Data that is collected automatically

8. To the extent that you access the Website, we will collect your Data automatically, for example:
 - a. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
 - b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

Third parties or publicly available sources

9. We may receive personal data about you from various third parties and public sources as set out below.

Technical Data from the following parties:

- (a) analytics providers such as Google based inside or outside the EU;
- (b) advertising networks inside or outside the EU; and
- (c) search information providers based inside or outside the EU.
- (d) Contact, financial and transaction data from providers of technical, payment and delivery services based inside or outside the EU.
- (e) Identity and contact data from data brokers or aggregators based inside or outside the EU.
- (f) Identity and contact data from publicly available sources such as Companies House.

Our use of Data

10. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

- a. internal record keeping;
- b. improvement of our products / services;

c. transmission by email of marketing materials that may be of interest to you;
in each case, in accordance with this privacy policy.

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests, or where we need to perform the contract we are about to enter into or have entered into with you, or where we need to comply with a legal obligation.

If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

For the delivery of direct marketing to you via e-mail, we will need your consent, whether via an opt-in or soft-opt-in:

- a. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
- b. for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we will provide.
- c. if you are not satisfied about our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.

When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

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

Who we share Data with

11. We may share your Data with the following groups of people for the following reasons:

- a. our employees, agents and/or professional advisors - We will only share your personal information with our employees, contractors, agents or professional advisors where it is necessary in order to fulfil a valid, stated purpose, as above, or to fulfil any statutory requirements.;

in each case, in accordance with this privacy policy.

Keeping Data secure

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

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

We will use technical and organisational measures to safeguard your Data, for example:

- a. access to your account is controlled by a password and a user name that is unique to you.
- b. we store your Data on secure servers.

We are certified to PCI DSS. This family of standards helps us manage your Data and keep it secure.

Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: business@morris-commercial.com.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data retention

13. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.

Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

14. You have the following rights in relation to your Data:

- a. **Right to access** - (commonly known as a "data subject access request") the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.

c. **Right to erase** - the right to request that we delete or remove your Data from our systems where there is no good reason for us continuing to process it. 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.

d. **Right to restrict our use of your Data** - This enables you to ask us to suspend the processing of your Data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the Data is unlawful but you do not want us to erase it.
- 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.
- You have objected to our use of your Data but we need to verify whether we have overriding legitimate grounds to use it.

e. **Right to data portability** - the right to request that we move, copy or transfer your Data.

f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests although in some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: business@morris-commercial.com. We try to respond to all legitimate requests within one month. Occasionally it could 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.

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites

15. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

16. Morris Commercial Limited may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Morris Commercial Limited. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Cookies

17. This Website may place and access certain Cookies on your computer. We use Cookies to improve your experience of using the Website and to improve our range of products. We have carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling us to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

General

18. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This privacy policy is governed by and interpreted according to the law of England and Wales. All disputes arising under this privacy policy will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to this privacy policy

19. We keep our privacy policy under regular review. This version was last updated on 1 March 2020.

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

We reserve the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations. You may contact Morris Commercial Limited by email at business@morris-commercial.com.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests

to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

20. If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Morris Commercial Limited

Email address: business@morris-commercial.com.

Postal address: Eco Campus, Station Road, Hinton-On-The-Green, WR11 2QU

Telephone number: +44 1386 574747

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 so please contact us in the first instance.