# SOCIAL MODE PRIVACY POLICY

#### GENERAL DATA PROTECTION REGULATIONS

#### PRIVACY POLICY AND PROCEDURES

This document explains our data processing practices and policies, the way in which your personal data is used and how we keep it secure.

Your personal information is important to us and we are committed to safeguarding and protecting your personal data and privacy.

The personal information that you have shared with us will be used to keep you updated with information on products and services that may be of interest to you. It will also be used in connection with operating your trade account. We will only use your personal data for these specific purposes.

We do not sell, rent or share your personal information with any third-parties for commercial reasons.

If you have any requests concerning your personal information or any queries with regard to our processing please contact us at <a href="https://hello@socialmode.co.uk">hello@socialmode.co.uk</a>

#### WHAT PERSONAL DATA DO WE HOLD?

We hold details provided by you. The data will typically include your name, job title, business address, email address and contact telephone numbers and bank details.

We also collect information and keep records about the transactions you undertake with us. These transactions will typically be order placing, request for quotations, requests for information and payment records.

In the case of sole traders and partnerships we may also hold home addresses and dates of birth. We may also keep information that is provided by you, obtained from your bank, credit reference agencies or from your referees that allows us to extend credit facilities to your business.

We may collect additional information in connection with your participation in any promotions or competitions offered by us and information you provide when giving us feedback.

We will never collect sensitive personal data about you without your explicit permission and clear explanation as to why it is required.

## WHAT DO WE USE YOUR PERSONAL DATA FOR?

We may use your information to provide and personalise our service to you. We will also use your contact details to communicate with you and send you information that is required to operate your account.

We will use your information to send offers and news on products and services, which we think may be of interest or be of benefit to you. In this case, you will always be given the choice to opt out of receiving such emails. You can withdraw your consent by contacting <a href="mailto:hello@socialmode.co.uk">hello@socialmode.co.uk</a>

Please note that there may be instances where it may be necessary for us to communicate with you for administrative or operational reasons relating to your account or our service.

Social Mode does not use any automated decision making systems or carry out profiling of personal data records.

#### DO WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?

We only share your information with our bankers, solicitors, credit insurers, credit reference agencies and our service provider for invoicing purposes. We will also share information with organisations to comply with legal and regulatory requirements.

It is our strict policy not to pass on any customer specific information to third parties for sales or marketing purposes.

# WHAT ARE THE LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL INFORMATION?

Social Mode is the Data Controller as defined by the EU's General Data Protection Regulation (GDPR).

We use your personal information to provide you with our products and services, including:

- Offering of credit account facilities.
- Delivering goods.
- Providing information.

We also use your information where it is in our legitimate interest to do so, such as:

- Updating our records to contact you about your account.
- Recovering debt.
- To follow guidance and best practice of regulatory bodies.
- For management and audit of our business operations and accounting.
- To carry out searches at credit reference agencies both at the application stage and periodically thereafter.
- To keep records of our communications with you.
- To maintain our good governance requirements and to comply with our legal and regulatory requirements.

#### HOW DO WE PROTECT THE DATA THAT WE HOLD?

All data is held on a private network server that is single point of entry firewall protected.

All data processing is carried out on password protected terminals with up to date anti viral software, linked to the private network server.

All emails are security scanned.

## PERSONAL DATA ACCESS RIGHTS

You have a right to access the personal data that is held about you. To obtain a copy of the personal information that Social Mode holds about you, please contact us at <a href="hello@socialmode.co.uk">hello@socialmode.co.uk</a>

You also have the right to move, transfer or copy your personal information.

You have the right to ask us to delete all personal data that is used for certain purposes, such as direct marketing and where there is no compelling, legal or regulatory reason for the data to be processed.

You have the right to ask us to correct or delete any inaccurate or incomplete personal data.

#### UPDATES AND CHANGES

This document may be updated from time to time in order to reflect changes to legislation or our procedures. Details of any changes will be published on our website.

Last Updated: 1st November 2019.