



## Privacy notice in accordance with the EU General Data Protection Regulation (GDPR)

Valid for customers, interested parties, suppliers as well as sales and cooperation partners of Customer First UK Ltd. (hereinafter referred to as "Customer First").

With the following information we give you an overview of the processing of your personal data by us and your rights from the EU General Data Protection Regulation (GDPR). Which data is processed in detail and in which way it is used depends largely on the products and services requested or commissioned in each case.

### 1. Responsible for data processing

Customer First Ltd.  
Apex Office Space  
(Formally Time Business Centre)  
1 Watervole Way  
Balby  
Doncaster  
DN4 5JP  
Tel: 0845 226 0719  
Email: [enquiries@customerfirst.org](mailto:enquiries@customerfirst.org)

### 2. Data and services

#### (a) Sources

We process personal data that we receive from you in the course of our business relationship. In addition, we process (to the extent necessary for the provision of our products and services) personal data which we have that we have permissibly obtained and are permitted to process from publicly accessible sources (e.g. b2b social media platforms, commercial and association registers, press, media, Internet).

#### (b) Categories of personal data

When initiating a business relationship or creating master data, the following personal data may be collected, processed and stored: Address and communication data (name, address, telephone, e-mail address, other contact data)

When using products and services within the scope of the contracts concluded with us, the following additional personal data may be collected, processed and stored in addition to the aforementioned data: Contract master data (order data, data from the fulfilment of our contractual obligations, details of any third-party beneficiaries), billing, performance and payment data (direct debit data, tax information, other personal master data (profession, employer), product data (e.g. services and products requested or booked).

#### (c) Customer contact information

In the course of the business initiation phase and during the business relationship, in particular through personal, telephone or written contacts, by you or initiated by Customer First, further personal data is generated. This includes, for example, information on the contact channel, date, occasion and result, (electronic) copies of correspondence and information on participation in direct marketing measures.



### 3. Purpose and legal basis of the processing

We process the personal data mentioned under 2. in accordance with the provisions of the EU General Data Protection Regulation (GDPR):

#### **a) For the fulfilment of contractual obligations (Art. 6 (1) b) GDPR)**

The processing of personal data is carried out for the purpose of establishing, implementing and terminating a contract for the provision of products or services, as well as for the implementation of pre-contractual measures for the preparation of offers, contracts or other requests directed towards the conclusion of a contract, which are made at your request. The purposes of the data processing are primarily based on the specific products and services and may include, among other things, needs analyses, advice and support. Further details regarding the purpose of data processing can be found in the respective (also pre-contractual) contractual documents. Interested parties may be contacted during the contract initiation phase, considering any restrictions that may have been expressed, and customers, suppliers as well as sales and collaborative partners may be contacted during the business relationship using the data that they have provided.

#### **b) On the basis of your consent (Art. 6 (1) a) GDPR)**

If you have given us your consent to process personal data for specific purposes, the legality of this processing is based on your consent. Any consent granted can be revoked at any time. This also applies to the revocation of declarations of consent that were given to us before the EU General Data Protection Regulation came into force (i.e. before 25 May 2018). Please note that the revocation is only effective for the future. Processing operations that took place before the revocation are not affected by this.

#### **c) Due to legal requirements (Art. 6. (1) c) GDPR) or in the public interest (Art. 6 (1) e) GDPR)**

We are subject to various legal obligations and legal requirements and process data for the following purposes, among others: identity and age verification, the fulfilment of fiscal control and reporting obligations, and the assessment and management of risks.

### 4. Recipients of the data

Access to your data is granted to those entities that require it to fulfil our contractual and legal obligations. Service providers employed by us may also receive data for these purposes, provided they comply with our written data protection instructions. With regard to the transfer of data to recipients outside Customer First, it should first be noted that we are obligated to maintain secrecy about all customer-related information of which we become aware. We may only pass on information about you if this is required by law, or if you have given your consent. Under these conditions, recipients of personal data may be, for example: Public bodies and institutions where there is a legal or official obligation; Contract processors to whom we transfer personal data in order to carry out the business relationship with you. In detail: Archiving, document processing, controlling, data destruction, purchasing/procurement, customer administration, marketing, reporting, risk controlling, expense accounting, website operations, auditing services, payment transactions. Other data recipients may be those entities for which you have given your consent to the transfer of data.



## 5. Duration of data storage

We process and store your personal data as long as it is necessary for the fulfilment of our contractual and legal obligations. If the data are no longer required for the fulfilment of contractual or legal obligations, they are regularly deleted, unless their (temporary) further processing is necessary (e.g. tax law retention periods).

## 6. Data protection rights of the data subject

Every data subject has the right of access under Art. 15 GDPR, the right of rectification under Art. 16 GDPR, the right of deletion under Art. 17 GDPR, the right to restrict processing under Art. 18 GDPR, the right of objection under Art. 21 GDPR and the right of data transferability under Art. 20 GDPR. In addition, there is a right of appeal to a data protection supervisory authority (Art. 77 GDPR in conjunction with Art. 19 BDSG). You can revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent that were given to us before the EU General Data Protection Regulation came into force (i.e. before 25 May 2018). The revocation of consent does not affect the lawfulness of the processing that took place on the basis of the consent until the revocation.

## 7. Obligation to provide data

Within the scope of our business relationship, you must provide us with the personal data that is necessary for the establishment and execution of a business relationship and the fulfilment of the associated contractual obligations or that we are legally obliged to collect. Without this data, we will generally have to refuse to conclude the contract, provide products or services or be unable to perform an existing contract and may have to terminate it.

## Information on your right of objection under Art. 21 of the EU Data Protection Regulation (GDPR)

### 1. Right of objection on a case-by-case basis

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data relating to you which is carried out on the basis of Art. 6 (1) e) of the GDPR (data processing in the public interest) and Art. 6 (1) f) of the GDPR (data processing based on a balancing of interests); this also applies to profiling based on this provision within the meaning of Art. 4 (4) GDPR. If you object, we will no longer process your personal data unless we can prove compelling reasons for processing that are worthy of protection and outweigh your interests, rights and freedoms, or unless the processing serves to assert, exercise or defend legal claims.

### 2. Right to object to the processing of data for advertising purposes

In individual cases, we process your personal data in order to carry out direct advertising. You have the right to object, at any time, to the processing of personal data concerning you for the purpose of such direct marketing, including profiling, to the extent that it relates to such direct marketing. If you object to processing for the purposes of direct marketing, we will no longer process your personal data for those purposes. The objection can be addressed to the person responsible without any formality.