

## Introduction:

First Choice Group and its subsidiary companies are committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (GDPR), Data Protection Act 1998 & Privacy and Electronic Communications Regulations (PECR).

Please read this policy carefully as it sets out how we use any personal data which you provide to us or which we collect from you. If you have any questions about this policy, don't agree with it or other, please contact our Data Officers at [gdpr@firstchoice-cs.co.uk](mailto:gdpr@firstchoice-cs.co.uk).

## 1. We will collect information from you if you:

- Register to use our website; this will include your name, address, email address and telephone number. We may ask you to provide additional information about your business and preferences on a voluntary basis;
- Place an order for products or service, this will include your name (including business name), address, contact details (including telephone number and email address) and your payment details;
- Create an account with us or provide your contact details when registering to use or accessing any product or service we provide;
- Corresponding with us by phone, e-mail, or in writing. (Calls may be monitored or recorded for training, quality assurance and other business purposes);
- Completing a survey or online forms, write posts on our message board, post any blogs, enter any competition or prize draw;
- Use our LiveChat service via our website, this will include your name, email address and telephone number;
- Visit to our site via CCTV and entry sign systems for health & safety and security purposes; *and*
- Sign up to receive our communications.

### If you visit our Website, we may automatically collect the following additional information:

- Technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; *and*
- Information about your visit to our website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

## 2. What we use your information for:

We will use your personal information to provide any information on services that you have requested or any products that you have ordered. This will include quotes, invoices, statements and order acknowledgements as appropriate for the products you have ordered. We may also contact you for feedback on your use of our products, services or our website.

We may use your personal data for internal purposes such as auditing, data analysis, and research to improve our services, website and customer communications.

We will disclose your information if we are required to by law. We may disclose your information to enforcement authorities if they ask us to, or to a third party in the context of actual or threatened legal proceedings, provided we can do so without breaching data protection laws.

### 3. Marketing

From time to time, we may use your information to contact you with details about our products and services which we feel may be of interest to you. This will include exclusive trade offers, service updates and industry-related news. We will not spam you or share your details with any third-parties.

You have the right at any time to change your contact preferences or opt-out of our direct marketing activities. If you wish not to be contacted by us, you can send us an email with your request to our Data Officers at [gdpr@firstchoice-cs.co.uk](mailto:gdpr@firstchoice-cs.co.uk).

### 4. Cookies and Traffic Data

Most websites you visit will use cookies to help customise your experience. Cookies are small text files that are placed on your computer by websites that you visit which collect standard internet log information and visitor behaviour information. They are also widely used in order to make websites work, or work more efficiently. Additionally, they are used to provide information to First Choice Group and its subsidiary companies to track visitor use of the website and to compile statistical reports on website activity.

Types of cookies we may use:

#### Analytical/performance cookies

These cookies allow us to recognise and count the number of visitors to our website and to see how visitors move around when they are using it. This helps us to improve the way our website works, for example, by ensuring that users find what they are looking for easily.

#### Functionality cookies

These cookies are used to recognise you when you return to our website. This enables us to personalise our content for you, such as greeting you by name and remembering your preferences. It also allows for live chat support during your browsing experience.

#### Targeting cookies

These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose. These cookies allow you to share and send information to other websites.

We also sometimes embed video content and photos from websites such as YouTube. Pages with this embedded content may present cookies from these websites. Similarly, when you use one of the share buttons on our website, a cookie may be set by the service you have chosen to share content through. You should check the relevant third-party website for more information about these cookies.

#### How to manage cookies

If you wish to restrict, block or delete cookies from our website or any other website, you can use your browser to do this. Each browser is different so check the 'Help' menu of your particular browser to learn how to change your cookie preferences.

Please bear in mind that if you do so, certain personalised features of this website cannot be provided to you.

### 5. Your information

If we hold any information about you which is incorrect or if there are any changes to your details please let us know so that we can keep our records accurate and up to date. If you would like to update your records, please contact us on [gdpr@firstchoice-cs.co.uk](mailto:gdpr@firstchoice-cs.co.uk)

## 6. Changes to our privacy policy

We may change our privacy policy from time to time. We will always update the privacy policy on our website, so please try to read it when you visit the website.

## 7. Transfers outside Europe

Personal data in the European Union is protected by data protection laws but other countries do not necessarily protect your personal data in the same way. We confirm that our customer's personal data held on systems at First Choice Group is hosted within Europe. Where we have used third party sites for our marketing activities, we will seek assurance that the data is protected by privacy notices in compliance with EU data protection requirements for example: The EU-U.S. Privacy Shield Framework.

## 8. Security and Storage of Data

First Choice Group handles sensitive customer data including cardholder information daily. Sensitive Information must have adequate safeguards in place to protect them, to protect cardholder privacy, to ensure compliance with various regulations and to safeguard First Choice Group. First Choice Group commits to respecting the privacy of all its customers and to protecting any data about customers from outside parties. Data Controllers have been assigned in each department to oversee how data is processed, handled and stored and all employees will ensure they:

- Handle customer information in a manner that fits with the sensitivity of the data;
- Do not disclose personal data unless security questions & account verification is completed;
- Action immediately any requests for data to be removed from First Choice Group systems unless systems are unavailable in which case as soon system functionality is restored;
- Keep Information no longer than required, including emails which will be evaluated on a 6-month basis and removed as applicable;
- Protect the sensitivity of cardholder information by never physically writing down or electronically storing any cardholder information;
- Report any data breach to the Data Controller so that the severity of the breach can be determined by following guidelines in Data Breach Procedure QP13001;
- Follow guidelines of the First Choice Group - Information Security Policy FCD0138 and User Password Policy FCD0136 to protect and secure the First Choice Group network.

## 9. Firewalls / Network Security

- Firewalls will be implemented at each internet connection and no direct connections from internet to the data environment will be permitted. All traffic must traverse through the First Choice Group firewall. Firewall rules will be reviewed on a six months basis to ensure validity;
- All machines will be configured to run the latest anti-virus software as approved by the Company and automatic updates will be set up and periodic scans;
- Staff will take responsibility to be vigilant for new threats which automated scanning tools may not detect and staff will have periodic awareness training to detect malicious and what action to take if their computer is infected; *and*
- Staff will also follow the First Choice Group User Password Policy (FCD0136) to ensure they have front line protection to secure the First Choice Group network.

## 10. Other Sites

If you follow a link from our website, product or service to another site or service, this policy will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy policies appearing on those sites or services.

## 11. Complaints

Where you take the view that your personal data is processed in a way that does not comply with the GDPR, you have a specific right to lodge a complaint. Please contact the First Choice Group Data Officers:

**For personal data issues & complaints:**

First Choice HR & Quality Manager

at [gdpr@firstchoice-cs.co.uk](mailto:gdpr@firstchoice-cs.co.uk)

**For security & breach of data:**

First Choice IT Systems Manager

If we are unable to resolve your concern, you may lodge a complaint with the relevant supervisory authority. The supervisory authority will then inform you of the progress and outcome of your complaint. The supervisory authority within the UK is the: Information Commissioner's Office (ICO).

**FCD0145 – ISSUE 1 MAY 18**