

MOVEVIRGO LIMITED PRIVACY NOTICE

SECTION 1 – GENERAL INFORMATION

1 Introduction

1.1 Movevirgo Ltd., (referred to in this Privacy Notice as we, us, or our) is a controller for the personal information that it collects and uses about you. Our contact details are set out in section 13 of this Privacy Notice. Any reference in this Privacy Notice to you or your, refers to anyone whose personal information we process. This Privacy Notice is to inform you how we will use your personal information, the legal basis which allows us to use your personal information, how we share your personal information and inform you of your rights in accordance with the laws in place that protect your personal information, including the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and the General Data Protection Regulation 2016/679 and any subsequent data protection legislation which is implemented in the United Kingdom (together, "Data Protection Legislation").

1.2 We will treat all of your personal information as confidential and in accordance with the Data Protection Legislation and your personal information will only be shared with others in accordance with this Privacy Notice.

1.3 We keep this Privacy Notice up to date, so if there are any changes to the way in which your personal information is used this Privacy Notice will be updated and we will ensure a notice of such changes is displayed on our various website homepages for a reasonable period of time.

2 How to use this Privacy Notice

1.1 This Privacy Notice is split into three sections as detailed below:

1.1.1 Section 1: general information applicable to all individuals;

2.1.1 Section 2: information only applicable to Website users; and

2.1.2 Section 3: information only applicable to prospective or actual customers who either purchase products from us, or make an enquiry to purchase products.

2.2 Please note, in the event you use the Website services offered by us and purchase product from us, all sections of this Privacy Notice will be applicable to you. If you have any questions as to what sections of this Privacy Notice are relevant to you, please contact a Company Director at enq@movevirgo.co.uk

3 What is personal information?

3.1 Personal information is any information that tells you something about a living individual. This could include information such as name, contact details, and bank account details.

4 For how long do we keep your personal information?

4.1 We will keep your personal information for 7 years commencing on the date of our last transaction with you to comply with our regulatory obligations. Your personal information will be retained in accordance with our retention policy, your rights under Data Protection Legislation and in line with our regulatory obligations.

4.2 Any personal information will be deleted in accordance with our data retention policy.

5 What is the legal basis of our data processing?

5.1 Under Data Protection Legislation we are only permitted to use your personal information if we have a legal basis for doing so as set out in the data protection legislation. We rely on the following legal bases to use your personal information:

5.1.1 where you have provided consent for us to process your personal information;

5.1.2 where processing is necessary to enable us to perform our contract with you, or take steps to enter into a contract with you at your request;

5.1.3 where we need to comply with a legal obligation

5.2 In some cases we will need your consent to obtain and use your personal information. When this is the case, we will ask for your consent and we will explain why we need the personal information at the time when we ask for your consent. If we are relying on consent, you can withdraw your consent to our processing of your personal information at any time by contacting us using the contact details below.

6 How do we share your personal information?

6.1 We will keep your personal information confidential and only share it with others for the purposes set out below and elsewhere in this Privacy Notice.

6.2 We will share your personal information in the following ways:

6.2.1 we share your personal information with any person working within Movevirgo Limited on a need to know basis to ensure we are able to perform our obligations to you;

6.2.2 we may share personal information in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of our business.

7 Security

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

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

7.3 Please note that as no data transmission over the Internet can be guaranteed to be 100% secure we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk.

8 Recording of telephone calls

8.1 No recording of telephone calls takes place.

9 Overseas transfers of your personal information

9.1 No client personal information is ever transferred overseas.

10 Your rights in relation to your personal information

10.1 You have a number of rights in relation to your personal information, these include the right to:

10.1.1 Be informed about how we use your personal information;

10.1.2 Obtain access to your personal information that we hold;

10.1.3 Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate;

10.1.4 Request that we erase your personal information in the following circumstances:

- If Movevirgo Limited is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected;
- If Movevirgo Limited is relying on consent as the legal basis for processing the personal information and you withdraw consent;
- If Movevirgo Limited is relying on legitimate interests as the legal basis for processing the personal information, and you object to this processing and there is no overriding compelling ground which enables us continue with the processing;
- If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation); or
- If it is necessary to delete the personal information to comply with a legal obligation.

10.1.5 Ask us to restrict our data processing activities where you consider that:

- Personal information is inaccurate;
- Our processing of your personal information is unlawful;
- Where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim; or
- Where you have raised an objection to our use of your personal information;

10.1.6 Request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you, and personal information where we are relying on consent to process your personal information;

10.1.7 Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information; and

10.1.8 Not be subject to wholly automated decisions which produce legal effects or which could have a similarly significant effect on you.

10.2 If you would like to exercise any of your rights or find out more, please write to use at enq@movevirgo.co.uk.

11 Processing your personal information based on consent - Marketing

11.1 If you have consented to receive newsletters, product news or other product update communications from us you can change your mind and opt out at any time. If you would like to stop receiving these communications from us, please contact us using the details below in section 13.

12 Complaints

12.1 If you have any complaints about the way we use your personal information please contact a Director of Movevirgo Limited, who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the data protection authority (the Information Commissioner in the UK) via their website www.ico.org.uk

13 Contact details

13.1 If you have any questions, comments or requests regarding any aspect of this Privacy Notice, please do not hesitate to contact us:
FAO The Directors, Movevirgo Limited, New Portreath Road, Redruth, Cornwall, TR16 4QL
Or via email, at enq@movevirgo.co.uk

SECTION 2 – WEBSITE USERS

Any reference to Website in this Privacy Notice refers to sites operated by Movevirgo Limited, namely:

www.movevirgo.co.uk, www.swellsurfproducts.co.uk, www.suscomp.com

1 How do we collect personal information from our Website?

1.1 We collect personal information about you from various sources including:

1.1.1 web enquiry forms located on our Websites

1.1.2 e-mails we provide to you so that you can contact us with enquiries and send us your details

2 What personal information do we collect using our Website?

2.1 We collect the following types of personal information:

2.1.1 your name, email address, postal address, telephone or mobile number;

2.1.2 details of any contact made with you (either initiated by us or by yourself)

2.1.3 details about any products and services which you have an interest in as offered on our Websites.

2.2 If you give us personal information about somebody else, such as a colleague or family member etc., (for example to arrange for the uplift of products you order) we will assume you have their permission to do so, and their data will also be subject to this Privacy Notice.

3 For what purposes do we use your personal information from our Website?

3.1 We use your personal information for the following purposes:

3.1.1 to respond to any enquiries or requests you make via our Websites;

3.1.2 to provide our services to you and to manage our business;

3.1.3 to keep you informed of services we provide which may be of interest to you (if you have consented to such marketing or an exemption applies), unless you have opted not to receive such information. We will use your name and email address to send these marketing communications to you;

3.1.4 to analyse how users utilise the Website; and

3.1.5 to comply with our legal obligations and professional codes and to identify, prevent or detect fraud or other crimes.

4 Using your personal information for profiling/automated decision making

4.1 We do not use your personal information for profiling or for automated decision making.

5 Social Media

5.1 None of the websites operated by Movevirgo Limited are linked to social media

6 Links to other website

6.1 Our Websites do not offer links to other websites.

SECTION 3 – PROSPECTIVE OR ACTUAL CUSTOMERS

1 How do we collect personal information from you?

1.1 We collect personal information about you from various sources including:

1.1.1 through the provision of a sale of a product / service offered;

1.1.2 the personal information you provide us when any contact is made with you (by way of telephone call, email or by any other means) in accordance with the provision of our services;

1.1.4 any personal information we may already hold about you;

2 What personal information do we collect during the potential or actual sale of products / services?

2.1 We collect the following types of personal information:

2.1.1 your name, email address, postal address, telephone or mobile number;

2.1.2 information about any of our products you may already own (in particular Swell surfboards);

2.1.3 your bank details, but only if a refund has to be made due to a change in your order requirements;

2.1.10 details of any contact made with you (either initiated by us or by yourself);

2.1.11 details about any products and services which you have an interest in as offered during the potential product enquiry or actual sale;

2.2 If you give us personal information about somebody else, such as a colleague (for example to arrange for the uplift of products you order), we will assume you have their permission to do so, and their data will also be subject to this Privacy Notice.

3 For what purposes do we use your personal information during any potential or actual sale of our products / services?

3.1 We use your personal information for the following purposes:

3.1.1 to respond to any enquiries or requests you make;

3.1.2 to provide our services to you and to manage our business;

3.1.5 to keep you informed of other services we provide which may be of interest to you (if you have consented to such marketing or an exemption applies), unless you have opted not to receive such information. We will use your name and email address to send the marketing communications to you;

3.1.7 to monitor and improve the services we offer to you;

3.1.8 to comply with our legal obligations and professional codes and to identify, prevent or detect fraud or other crimes; and

3.1.9 in connection with any sale, merger, acquisition, disposal, reorganisation, restructuring or similar change to our organisation.

4 Using your personal information for profiling/automated decision making

4.1 We do not use your personal information for profiling or for automated decision making.