## **Privacy Policy of GBW Capital Ltd**

Our privacy policy confirms we do not receive personal buyer information from Amazon.co.uk. It sets out how some personal buyer information is made available to us by Amazon.co.uk but that it is never maintained, processed or controlled by us in any way. It informs how we use this information and under what circumstances, if any, Amazon.co.uk make it available to other parties via our online seller account on Amazon.co.uk.

We abide by and are compliant with the Data Protection Act 1998 (herein referred to as "The DPA") and the General Data Protection Regulation (herein referred to as "The GDPR") which comes into effect on 25th May 2018. We are committed to abiding by the aforementioned regulations on an ongoing basis.

### **Personal Buyer Information**

When selling on Amazon.co.uk, we do not receive or process any personal data from our customers. Amazon.co.uk fulfill all our buyers' orders on our behalf and maintain, process and control, all personal buyer information under their own privacy policy. Therefore for the purposes of GDPR, Amazon.co.uk are both the Data Processor and Data Controller. We retain information provided by Amazon.co.uk, such as transaction information for internal financial accounting purposes. It is a legal requirement to retain this information for a period of seven years.

#### Data Available to us

We do not receive personal buyer information from Amazon.co.uk. However Amazon.co.uk do make this personally identifiable information available to us only when it is voluntarily submitted by buyers when placing an on-line order. The data Amazon.co.uk makes available to us includes: delivery name, delivery address, e-mail address (in encrypted format), date of order, items ordered. We do not sell or rent personally identifiable information to any third party for any purpose.

## How we use Buyers' Order Information

We may use buyers' order information, made available to us by Amazon.co.uk but not maintained, processed or controlled by us in any way, to do the following:

- carry out regulatory checks to meet our legal obligations
- prevent and detect crime
- develop and improve our products
- undertake anonymised statistical analysis (data does not contain personal buyer information)
- contact buyers by way of their e-mail address (provided by Amazon.co.uk in encrypted format), to provide product instructions, tips and guidance.
- contact buyers by way of their e-mail address (provided by Amazon.co.uk in encrypted format), to request feedback and product reviews, for our product listings or seller account on Amazon.co.uk.

As part of our commitment to providing high quality customer service, we may make use of a third party organisation to contact buyers electronically on our behalf, by way of the buyers' e-mail address (in encrypted format). The function of the third party organisation would be to provide buyers with product instructions and guidelines, or to request customer feedback or product reviews. The third party organisation will use data made available to them by Amazon.co.uk via our online seller account on Amazon.co.uk, to fulfill this function,

We treat all information we hold for orders made by buyers on Amazon.co.uk, as private and confidential. This order information does not include any personal information of buyers. We will not reveal any details concerning buyers' orders to anyone not connected with us, unless:

- we are required or permitted to do so by law
- it is required by law enforcement, fraud prevention or credit reference agencies

We may use personal buyer information made available to us by Amazon.co.uk, which is maintained, processed and controlled by Amazon.co.uk, to ensure orders placed by buyers on Amazon.co.uk, are fulfilled to a reasonable standard. Personal buyer information such as the buyers' delivery details, will allow us to fulfill a buyers' order in such circumstances but not exclusive to, providing them with a free replacement product, the buyer not receiving the original order, delays in the buyer receiving their order.

# **Data Subject Access Requests**

Under The GDPR buyers are entitled to obtain from Amazon.co.uk (the Data Processor and Data Controller for the purposes of The GDPR when we are selling on Amazon.co.uk) a copy of the data held concerning them and to have any inaccuracies in the data rectified. Amazon.co.uk are obliged to provide this data to within 1 calendar month of the request and free of charge. The privacy policy of Amazon.co.uk covers all data subject access requests and should be referred to.