



Privacy policy (version: 1:00 date: 01 06 2018)

1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors, customers and service users.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors, customers and service users; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 We do not use cookies on our website..

1.4 In this policy, "we", "us" and "our" refer to James Development Co Ltd. For more information about us, see Section 12.

2.1 In this Section 2 we have set out:

- (a) the general categories of personal data that we may process;
- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process personal data; and
- (d) the legal bases of the processing.

2.2 We may process data about your use of our website and services ("usage data"). The usage data includes only the number of web site visitors and whether they unique, first time or returning visitors. The source of the usage data is stacounter.com This usage data may be processed for the purposes of analysing the use of our services. The legal basis for this our legitimate interests, namely monitoring and improving our website and services.

2.3 We may process your account data ("account data"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining records of our communications with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our business, website and services OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.4 We may process your information included in your customer record on our purchaser database ("customer record"). The customer record data may include your name, address, telephone number, email address, company details. The customer record data will not be used for any other purpose and will not be disclosed to third parties unless for any remedial works or contract obligations between us. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business OR the performance of a contract between you and us, and/or taking steps, at your request, to enter into such a contract.

2.5 We may process information contained in any enquiry you submit to us regarding goods and/or services ("enquiry data"). The enquiry data may be processed for the purposes of offering and selling relevant goods and/or services to you at your request. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.



2.6 We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and managing our products and services to customers. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.6 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website, services and business.

2.7 We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services, business and communications with users.

2.8 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.9 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

2.10 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.11 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

3.1 We may disclose your personal data to any member of our group of companies or (this means our subsidiaries and related legal partnerships or companies) insofar as reasonably necessary for our commercial purposes.

3.2 We may disclose your personal data to our insurers and/or professional advisers in so far as reasonably necessary for the purposes of obtaining or maintaining insurance

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coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.3 We may disclose your "customer record" and "enquiry" data to our suppliers in so far as reasonably necessary for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.