

Pro Centre Ltd | Privacy Policy

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1. Our commitment

At Pro Centre Ltd, we are committed to protecting the privacy of our customers; this policy sets out how we collect, use and safeguard your personal information and the conditions under which we may need to share your data. This policy also covers information we may use for our marketing and communication activities and your choices regarding these activities, your privacy rights and how the law protects you.

Our Promise

- Always safeguard your personal data, keeping it safe and private.
- Never sell your data.
- Never pass your information on to a third party who is not critically related to the provision of our service. **(See Section 7. Disclosure of your data)**
- Always offer you choices regarding our marketing, in what you want to receive, when and how.
- Always be open and transparent about why we collect your data, how it is used and stored, your rights in having access to your data and your choice to have your data removed.

Please be aware that by using our website and/or any of our services you are agreeing to our Privacy Policy. We may change this policy from time to time and we advise you check back regularly to ensure you are happy with any updates. This policy covers the General Data Protection Regulations (GDPR) changes that come into effect on 25 May 2018.

2. Who we are

Pro Centre Ltd is a photographic rental and retail company
We are a registered company in England & Wales with Registration No: 8922328 at:

**E3 The Premier Centre
Abbey Park
Romsey
SO51 9DG**

Data Protection registration number is ZA115645

The term 'Pro Centre Ltd' or 'us' or 'we' refers to Pro Centre Ltd as the owner of the website. The term 'you' refers to the user or viewer of our website.

If you have any questions about the personal data we hold for you, or want more details on how we use your information, you can contact us on +44 (0) 207 729 8822 or email info@procentre.co.uk.

3. Why we collect and keep your data

We must have at least one or more of the following reasons to satisfy a 'lawful basis' to collect your data:

a) To fulfil a contract we have with you

We collect and keep your data in order to provide you with the service you are paying us for.

b) When it is our legal obligation to do so

c) When you give us explicit consent to do so

'Consent' means ensuring we offer you choice and control regarding your data, how it is used and how we do business with you.

d) For our legitimate interests

A 'legitimate interest' means that we must have a clear and specific benefit or outcome in mind, relating to a business, service or commercial reason to use your information. We must always be mindful of what is right and best for you, and our legitimate interests must not conflict with this.

Some of our legitimate reasons are listed below:

- To manage our relationship with you and deliver a service to you
- To respond to any queries or complaints, and to show we treated you fairly
- To maintain records in accordance with government rules that we must adhere to
- To make informed business decisions about the service we are providing, to support development and progression
- To have a greater understanding of our customers, their requirements and preferences

Our customers and anyone we do business with will have the assurance that we will only collect personal information and data that we absolutely require to satisfy a lawful basis. Your data will only be used as required to perform functions specifically pertaining to our business.

4. Your rights

Of course, you have the right not to share personal information with us (the 'right to object') or ask us to delete, remove or stop using your data (the 'right to be forgotten').

There may be official reasons why we continue to hold and use your data but if you believe we do not have a legitimate reason, please contact us to discuss why you think we should not be using it.

To provide the service you have chosen there will be information we will need, including personal information, so we can fulfil our contractual service obligations to you. If you choose not to provide the

information we require, or withdraw your consent, it may prevent processes from taking place and may even result in us not being able to provide you with a service at all. Some of the information we ask for may be optional, and we will tell you if this is the case.

We may make 'automated decisions' based on your data. This means we may place you in smaller groups with other similar customers to research and study, learn about your needs and expectations in order to make business and service decisions. This helps us to manage our customer relationships and tailor our services and products to specific customer needs. You will always have the 'right to object' and the 'right to access' how we do this.

If you find you are unhappy in how we have used your personal information, please let us know. We will take all reasonable steps to ensure your complaint is dealt with efficiently and fairly.

If you remain dissatisfied, you have the right to complain directly to the Information Commissioners Office (ICO) who can be contacted as follows:

Write to: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Email: www.ico.org.uk

5. The Types of Information We Collect

Our Reason: Service Provision

We will process this data under the lawful basis of one or more of the following:

- A contractual obligation
- A legal obligation
- A legitimate interest

Type	Example	Our purpose and legitimate interest
Contact Details	Your name, address, main telephone number and email address	To communicate information to you as part of our service
ID Documents	Examples may be copies of passport, driver's licence, utility bills	To prove your identity so that we can provide a service, and to uphold our obligations to Money Laundering regulations
Payment details	Debit/Credit Card details, bank details	To perform monetary transactions such as taking and making payments
Communications	Emails, letters, messages and telephone call	To allow us to keep a history of your activity with us so we can provide an informed, efficient and complete service, act upon any instruction you give us or deal with any issues

Our Reason: Service Research, Improvements & Development

We will process this data under the lawful basis of a legitimate interest.

Type	Example	Our purpose and legitimate interest
Behavioural	How you use our service, the facilities we provide and the outcome	To inform us so we can tailor our service to your needs and make improvements
Technological	The devices and technology you are using to access and use our service	To inform us so we can tailor our service to your needs and make improvements
Usage	How you use our service, how often you use our facilities	To inform us so we can tailor our service to your needs and make decisions on where to enhance the service for our customers
Communications	What we learn about you from any form of dialogue between us	To help us communicate with you better and to inform us so we can provide a more personal service to you

Our Reason: Marketing and Market Research

We will process this data under the lawful basis of consent and/or a legitimate interest.

Type	Example	Our purpose and legitimate interest
Contact Details	Email addresses, telephone numbers	We may send you newsletters on new products or services we have, promotions or contact you to invite you to enter competitions
Locational	Where you are such as your address, or your computer IP address	Information on where our clients are located contributes to a greater understanding of our client base

6. How we collect data

You give it to us when you:

- subscribe to any of our services or purchase an insurance product
- email us or send us a message in the Members Area, or send us a letter
- talk to us by telephone
- complete any of our in-service forms (such as an account application form)
- complete a customer survey
- take part in any of our promotions or competitions
- contact us via our Social Media platforms

We collect it as part of the natural course of our service:

- in letters, emails and telephone calls
- by performing transactions such as service payments, direct debits

7. Disclosure of your data

Your information will be made accessible to our employees, officers, agents or subcontractors as reasonably necessary to perform the service you have chosen. Under no circumstances will we sell your data. We will not, without your express consent or justifiable reason, share your data to a third party unconnected to our business.

We work with several suppliers and third-party organisations to provide our full range of services to you. It will be necessary for us to share some of your data with these organisations, so we can fully deliver our services. These will be made clear to you at the appropriate time and you will be asked for consent. For all third parties we work with, our own due diligence is carried out to ensure compliance with Data Protection and GDPR legislation.

All third parties we use are UK based or have data facilities in the EU and no data will be shared outside of the EU. Your information will only be shared with a third party where it is necessary, in order for us to provide a function of our service. Examples of external organisations are:

- Telephone provider

- Email and Customer Relationship Management software provider
- IT & Tech support providers
- Website support, including 'Click to Chat'
- Online payments software provider
- Banks
- Online software providers for newsletters, forms and surveys

For more information on any of the external third party organisation we work with, you can contact us on +44 (0) 207 229 8822 or email info@procentre.co.uk.

In rare cases, we may need to disclose your information if required to do so by law:

- a) In connection with any legal proceedings or prospective legal proceedings;
- b) In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- c) To the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- d) To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

8. How long we keep your information

As a present or past customer of Pro Centre Ltd

- Please refer to our separate retention

As a website user

- Please refer to our separate website policy

9. Security of your data

We are committed to safeguarding and will take all reasonable technical and organisational precautions to prevent the loss, misuse, alteration or exposure of your personal information.

We will store all the personal information you provide on our secure (password and firewall protected) servers. Where applicable electronic payments you make to us will be encrypted using SSL technology. Of course, data transmission over the internet is known to be insecure, and we cannot guarantee the security of

Customers telephoning us will be asked to confirm their identity by answering selected security questions before our advisors will discuss details of their account. If you have nominated someone to liaise with us on your behalf we will require your express authorisation to discuss your account with that person. This includes any of your employees.

10. Marketing

The personal information we use for our marketing is what we have collected when you subscribe to our services and what you have consented to tell us. We may use your personal information to:

- Send you our customer newsletter
- Tell you of any relevant offers and products
- Invite you to take part in a competition we may be running
- Ask you to help our research by completing a survey

We can only include you in our marketing communications if you have explicitly consented (by ticking check-boxes provided on our forms we use to collect your data) or we have a business or commercial reason to do so – a legitimate interest.

If you have opted to receive marketing from us you can change your mind and withdraw consent at any time by contacting us, or using the opt-out functions provided. Likewise, if you'd like to start receiving marketing from us, you can notify us to include your details on our mailing lists.

Whatever you choose to do, we will continue to send you service communications that pertain particularly to activity with your service subscription. These may be statements, notifications, updates or guidance. These communications form part of our service to you and are not part of marketing.

11. Updating and accessing your personal information

If you believe that any information we hold about you is incorrect or incomplete, you have the 'right to rectification'. Please do let us know. We will take all reasonable steps to make changes where necessary to ensure accuracy, within the required one month of your notification.

You may instruct us to provide you with any personal information we hold about you:

- Email: info@procentre.co.uk Write to: Pro Centre Ltd, 14 Union Walk London E2 8HP.

12. Associated documents

- Service Terms & Conditions and/or Service Level Agreement (where applicable)
- Data Retention Policy
- Website Policy
- Subject Access Request Procedure

13. Acceptance

This Privacy Policy was last updated in April 2018. By using our services, you agree to the collection and use of your personal data and information as set out in this Privacy Policy. Please share any questions, concerns or comments you have about this policy by writing to:

The Managing Director
Pro Centre Ltd
14 Union Walk
London
E2 8HP

Or email info@procentre.co.uk