

**Cater Link**  
**PRIVACY NOTICE - Refund Specific**

Caterlink is committed to protecting and respecting your privacy. We take your privacy very seriously and we ask that you read this Privacy Notice carefully as it contains important information on:

- a) the personal data we collect about you;
- b) how we look after your personal data when you visit our website (regardless of where you visit from);
- c) with whom your personal data might be shared; and
- d) your privacy rights and how the law protects you.

## **WHO WE ARE**

Cater Link is the controller and responsible for your personal data (collectively referred to as "Caterlink", "we", "us" or "our" in this Privacy Notice).

## **PERSONAL DATA WHICH WE COLLECT**

### Personal data provided by you

We collect personal data about you when you:

- (a) Complete a refund request form

The personal data collected in the above manner includes your:

- (a) full name;
- (b) your child's name, school and class number
- (c) email address;
- (d) telephone number
- (e) bank details (sort code and account number)

### Personal data about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- (a) give consent on his/her behalf to the processing of his/her personal data;
- (b) receive on his/her behalf any data protection notices;
- (c) give consent to the transfer of his/her personal data outside the European Economic Area

## **HOW WE USE YOUR PERSONAL DATA**

### Overview

We collect information about you so that we can:

- (a) identify you and any accounts you hold with us or another payment system provider;

- (b) process your refund and return your money efficiently and safely
- (c) assist you with your queries in relation to your refund
- (d) improve our services

## **WHEN WE MIGHT SHARE YOUR PERSONAL DATA WITH THIRD PARTIES**

We do not, and will not, sell any of your personal data to any third party - including your name, address, email address or payment card information. We want to earn and maintain your trust, and we believe this is essential in order to do that.

As an essential part of being able to process your refund, we may share your data with the following categories of third parties:

- (a) other companies within the WSH group, as our support services are provided by employees who are employed by other companies in the group
- (b) the payment provider through whom you made the payment in the first place. (eg Parent Pay, Parent Mail, etc.)
- (c) professional advisers including lawyers, bankers, auditors and insurers who provide advice to us when we require it;
- (d) law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- (e) third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice; and

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. If you would like any more information about the third parties which we work with to provide our services to you, please contact us on the contact details provided later in this Privacy Notice.

## **HOW WE ASK FOR CONSENT**

In those cases where we need your consent to hold and process your personal data, we will ask you to check a box on any form requiring consent. By checking these boxes you are confirming that you have been informed as to why we are collecting the information, how this information will be used, for how long the information will be kept, who else will have access to this information and what your rights are as a data subject (all of which is set out in this Privacy Notice).

## **HOW WE KEEP YOUR PERSONAL DATA SECURE**

To protect your information, we have policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have the necessary security measures in place.

All employees, contractors and sub-contractors receive the necessary training and resources to ensure they understand their responsibilities in relation to all of our policies and procedures.

In addition to these operational measures we also use a range of technologies and security systems to reinforce the policies and procedures, including ensuring that:

- (a) access to personal data is strictly restricted to those employees who need to access this information as part of their role;
- (b) we store your personal data on secure servers and unauthorised external access to personal data is prevented through the use of a firewall;
- (c) information used for reporting and/or customer profiling purposes is anonymised (so that it does not identify you);

To make sure that these measures are suitable, we run vulnerability tests regularly. Audits to identify areas of weakness and non-compliance are routinely scheduled.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA**

We shall only retain your information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. As a refund request provides evidence of a financial transaction it may be necessary to hold the some or all of the data provided for up to 7 years. If you would like more information about how long we retain specific types of your information, please contact us on the contact details provided later in this Privacy Notice.

## **TRANSFERS OF YOUR PERSONAL DATA OUT OF THE EEA**

All information you provide via our website is stored on our secure servers within the European Economic Area ("EEA"). If any data that we collect from you is transferred to, or stored at, a destination outside the EEA at any time, we will update this Privacy Notice accordingly.

## **YOUR RIGHTS**

### The right to access information we hold about you

At any point you can contact us to request the information we hold about you as well as why we have that information, who has access to the information and where we got the information. Once we have received your request we will respond within 30 days.

### The right to correct and update the information we hold about you

If the information we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

### The right to have your information erased

If you feel that we should no longer be using your information or that we are illegally using your information, you can request that we erase the information we hold. When we receive your request, we will confirm whether the information has been deleted or tell you the reason why it cannot be deleted.

### The right to object to processing of your information

You have the right to request that we stop processing your information. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your information to comply with your other rights.

### The right to ask us to stop contacting you with direct marketing

You have the right to request that we stop contacting you with direct marketing.

### The right to data portability

You have the right to request that we transfer your information to another controller. Once we have received your request, we will comply where it is feasible to do so.

For your security we may need to verify your identity before we process your instructions above.

## COOKIES AND TRACKING

### Use of cookies

A cookie is a small text file which is placed onto your device when you access our website. We use cookies on this website to:

- (a) recognise you whenever you visit this website (this speeds up your access to the website as you do not have to log in each time);
- (b) obtain information about your preferences, online movements and use of the internet;
- (c) carry out research and statistical analysis to help improve our content, products and services and to help us better understand our customer requirements and interests;
- (d) make your online experience more efficient and enjoyable.

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookie is essential in order for us to provide you with a product or service you have requested.

### Consent to cookies

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this Privacy Notice. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

### Description of cookies

The table below provides some information on the cookies which we use on our website:

Type of Cookie	What it does	Why is it used	How long it lasts
Google Analytics	Tracks Users Data	Making your website experience better	As long as you are on the website
Browser Cookies	Save our website images for faster loading	Make website browsing faster	Check browser for when it clears your cache.

### Turning off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.

## CONTACTING US

If you have any queries about this Privacy Notice, need further information about how we use your personal data or wish to lodge a complaint, please contact us by any of the following means:

- phone us on: 0118 9356 700
- email us at: [info@caterlinkltd.co.uk](mailto:info@caterlinkltd.co.uk)
- write to us at: TVP2 300 Thames Valley Park Drive, Reading, RG8 8HR
- contact us using our “Contact us” page on the website.

You also have the right to lodge a complaint with the Information Commissioner’s Office directly. Further information, including contact details, is available at <https://ico.org.uk>.

## CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time. You should check this Privacy Notice occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.

Where we have made any changes to this Privacy Notice which affects the manner in which we use your personal data, we will contact you by email to inform you of this change.

This Privacy Notice was last updated on 18<sup>th</sup> January 2020.