
PRIVACY POLICY

BACKGROUND:

MetDesk Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.nrws.co.uk (“the NRWS Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of NRWS Site. If you do not accept and agree with this Privacy Policy, you must stop using NRWS Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of the NRWS Site;
“Cookie”	means a small text file placed on your computer or device by the NRWS Site when you visit certain parts of the NRWS Site and/or when you use certain features of NRWS Site. Details of the Cookies used by the NRWS Site are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About Us

The NRWS Site is owned and operated by MetDesk Limited, a limited company registered in England under company number 08282087.

Registered address: 4 Station Approach, Wendover, Buckinghamshire, HP22 6BN, UK.

Address: 4 Station Approach, Wendover, Buckinghamshire, HP22 6BN, UK.

VAT number: 151303164.

Data Protection Officer: Giles Ripley.

Email address: GDPR@metdesk.com.

Telephone number: 01296 623888.

Postal Address: 4 Station Approach, Wendover, Buckinghamshire, HP22 6BN, UK.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of the NRWS Site. The NRWS Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the

privacy policies of any such websites before providing any data to them.

4. **What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

6. **What Data Do We Collect?**

Depending upon your use of the NRWS Site, we may collect some or all of the following personal and non-personal data (please also see Part 14 on our use of

Cookies and similar technologies):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Payment information;
- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, your activity on the NRWS Site, and the site you exit to.

7. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes:

- Providing and managing your Account;
- Providing and managing your access to the NRWS Site;
- Personalising and tailoring your experience on the NRWS Site;
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by emailing us).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Notwithstanding the other provisions of this Section, we may retain your personal data where such retention 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.

9. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Storing personal data on secure servers, personal computers and mobile devices, and in secure manual record keeping systems.
- Passwords are secured using encryption technology.

10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. **How Can I Control My Personal Data?**

11.1 In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via the NRWS Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and by managing your Account).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can I Withhold Information?**

You may access certain areas of the NRWS Site without providing any personal data at all. However, to use all features and functions available on the NRWS Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

13. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. **How Do You Use Cookies?**

The NRWS Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of the NRWS Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on the NRWS Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a cookie banner requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the NRWS Site may not function fully or as intended.

Certain features of the NRWS Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that the NRWS Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however

you may lose any information that enables you to access the NRWS Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: GDPR@metdesk.com.

Telephone number: 01296 623888.

Postal Address: 4 Station Approach, Wendover, Buckinghamshire, HP22 6BN.

16. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on the NRWS Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the NRWS Site following the alterations. We recommend that you check this page regularly to keep up-to-date.