

## PRIVACY POLICY

### KELERBAY LIMITED T/A DOREE BONNER INTERNATIONAL

Kelerbay Limited trading as Doree Bonner International ("We") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us (whether through our website or otherwise), will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.doreebonner.co.uk](http://www.doreebonner.co.uk) you are accepting and consenting to the practices described in this policy.

For the purpose of GDPR the data controller is Kelerbay Limited whose registered office address is International House, 19 Kennet Road, Dartford, Kent, DA1 4QN.

#### **Information we may collect from you**

- Information you give us. You may give us information about you by filling in forms on our site [www.doreebonner.co.uk](http://www.doreebonner.co.uk) (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to any of our services, subscribing to newsletters or other updates, search for a product or service, place an order with us, make an enquiry, participate in social media functions on our site, enter a competition, promotion or survey and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and employer.
- Information we collect about you. With regard to each of your visits to our site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
  - Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We may receive information about you when we send you an electronic communication, such as clicks on links. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

#### **Data Erasure**

- If you do not enter into a contract with us your data will automatically be deleted after a period of one year, unless your request it to be erased earlier and we have no legal obligation to retain the data.
- If you enter into a contract with us your data will automatically be deleted after a period of seven (7) years from the date of the last transaction / service provision, unless we have a legal obligation to retain the data.

#### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

Uses made of the information

We use information held about you in the following ways:

#### **Information you give to us. We will use this information:**

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

#### **Information we collect about you. We will use this information:**

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### **Disclosure of your information**

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. Our group companies will use your personal information for the same purposes and in accordance with this privacy policy.

We may share your information with selected third parties including:

- Business partners, suppliers, International agents and sub-contractors for the performance of any contract we enter into with them or you.
- Analytics and search engine providers that assist us in the improvement and optimization of our site.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Doree Bonner International were acquired by a third party, in which case personal data held by it about its customers may be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Doree Bonner International, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### ***Where we store your personal data***

The data that we collect from you will be stored within the European Economic Area ("EEA"). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### ***How do we protect your personal information?***

We have security arrangements in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your personal information. We take appropriate organisational and technical security measures and have rules and procedures in place to ensure that any personal information we hold on computer systems is not accessed by anyone it shouldn't be.

When we use third party organisations to process information on our behalf, we ask them to demonstrate their compliance with our security requirements, and any instructions we may give them and their compliance with relevant data protection legislation throughout the time they work for Kelerbay. These organisations take their instructions from us and their obligations with regard to what information they process and what they can do with it are agreed in the contracts we have with them.

#### ***Your rights***

We will not use your data or disclose your information to any third party for any purposes other than undertaking the services you have contracted us to undertake.

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### ***Right to rectification***

You have the right to request that we rectify personal information which is inaccurate or incomplete. In the first instance contact your Move Manger in writing specifying the inaccurate or incomplete personal information. Provide them with the correct personal information and ask them to rectify it. We are required to rectify the information within one month. This can be extended to two months if the request for rectification is complex.

#### ***Right to erasure (to be forgotten)***

You have the right to request the deletion or removal of personal information where there is no compelling reason for its continued processing. Individuals have a right to have personal information erased and to prevent further processing in the following circumstances:

- Where the personal information is no longer necessary in relation to the purpose for which it was originally collected or processed;
- When you withdraw your consent for your personal information to be processed;
- When the individual objects to the processing and there is no legitimate interest for the personal information to be processed;
- Personal information has unlawfully been processed;
- Personal information must be erased on the order of the courts.

We may refuse to comply with your request for erasure if we are required to comply with a legal or statutory obligation or if the personal information will be required for the purposes of resolving a claim, complaint or in the defence of a claim or complaint.

#### ***Right to restrict processing***

You have the right to restrict the processing of your personal information in the following circumstances:

- Where you contest the accuracy of the personal information which is being processed. You can ask for the restriction to be put in place until you are satisfied that the inaccuracies' have been rectified;
- The processing of the information is deemed to be unlawful, but you do not want your personal information to be erased;
- The personal information is no longer required by us, but you would like us to retain it to establish, exercise or defend a legal claim;

#### ***Right to object***

You have the right to object to the processing of your personal information related to direct marketing even if you have previously consented to your personal information being processed for that purpose.

**Direct marketing**

Your personal information may be used by us to contact you by post, phone, e-mail or electronic messaging services and social media, with information about products and services (including discounts and special offers) we think will be of interest to you. We may also send you information about services and products provided by third parties are our trusted partners which may be of interest to you.

If you wish to opt out of receiving marketing messages from us, then please:

- Tick the box on the website to confirm that you do not wish to receive any information;
- If you have opted to receive information but change your mind, e-mail your Move Manger quoting your reference number.

If you choose to e-mail us, please note we are unable to accept any liability for personal information or data which is lost or abused in transmission to us. We will endeavour to update your marketing preferences as soon as we possibly can.

Although you have opted out of direct marketing, you will still receive service-related communications from us if we are still providing you with services.

**In the case of a potential leakage of personal data or information**

For the purpose of this document we consider any incident of acquiring, using or revealing personal information or data, without any prior authorisation and which jeopardises the security, integrity and confidentiality of the information and thus creates a risk for the client as leakage.

For example:

- An employee who accesses the personal information of a client outside of the limits of his work.
- The loss or theft of a work computer, tablet or mobile phone that contains unencrypted personal information of a client.
- Personal information of a client sent to the wrong address, fax or email because of an error.

Any potential leakage of information needs to be reported to management a maximum of two days after the discovery of the leakage. If the leakage was a result of the loss or theft of a computer, the IT department needs to be informed as well.

**Access to information**

You the right to access information held about you. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

**Changes to our privacy policy**

Our Privacy policy is reviewed periodically. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

**Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [moving@dbonner.co.uk](mailto:moving@dbonner.co.uk)