



WOVEN

Website (External) Privacy Policy

**Policy Ref: POL-024
Version 4.0**

**Date Published: 01 Sept 2024
Review Date: 01 Sept 2025
Policy Owner: Head of Compliance
Approved by: Executive Leadership Team**



Table of Contents

1. Introduction to We Are Woven Website Privacy Policy	3
2. Principles of Data Protection	3
3. Personal Data we may collect from you on the website	4
4. Cookie Policy	4
5. How long we will store your Data	4
6. Legal basis	5
7. Use of your data with third parties	5
8. Security of your personal information	6
9. Your Legal Rights in Respect of your Personal Information	6
10. Social Media Apps	7
11. Contact us	7
12. Policy Compliance & Responsibilities	7
13. Document Management and Policy Compliance	7
Appendix A – Glossary of Definitions	8



1. Introduction to We Are Woven Website Privacy Policy

- 1.1. This Privacy Policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data and keep it safe.
- 1.2. At We Are Woven, protecting your personal data is extremely important to us and not just a matter of complying with the regulations. Security and privacy are part of our overall business. We are committed to ensuring that your personal information is protected, and you understand how it is used.
- 1.3. This policy (hereinafter the “Privacy Policy”) is incredibly important regarding your (the Data subjects’) rights and freedoms and expectations on how we may store and process your personal information. This policy will explain what we collect, how we collect it, how we use it, the controls we have over your information and the security measures we have in place to protect it. This website privacy policy covers your experience in using our website and any data we may capture or process in your use of it.
- 1.4. The Privacy Policy governs data, security, privacy, and data processing across our entire business. The Company endeavours to be in compliance with all applicable data privacy laws and regulations, including the EU Directive 2016/679 (the General Data Protection Regulation) [“the GDPR”], which is a legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union [EU] and European Economic Area [EEA]) and the UK Data Protection Act 2018.
- 1.5. The success of our service depends on our ability to maintain the trust of our users, clients, and their customers.
- 1.6. In this Privacy Policy when we refer to The Company, “the Group”, “us”, “we” or “our” we mean We Are Woven and all subsidiaries.

2. Principles of Data Protection

- 2.1. When using the term “personal data” or “personal information” in this Privacy Policy, we mean information that relates to you and from which you could be identified, either directly or in combination with other information which we may have in our possession.
- 2.2. We will comply with data protection law and principles in respect to your personal data, which means that your personal data will be:
 - Used lawfully, fairly and in a transparent way.
 - Collected only for lawful purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 - Relevant to the purposes we have told you about and limited only to those purposes.
 - Accurate and kept up to date.
 - Kept only as long as necessary for the purposes we have told you about.
 - Kept securely and protected.
- 2.3. Our site may provide links to third party websites. The Company is not responsible for the conduct of non-The Company companies linked to the site and you should refer to the privacy notices of these third parties as to how they may handle your personal information.



3. Personal Data we may collect from you on the website

- 3.1. If you Request More Information from us, using the website form we will collect the data you provide which is as a minimum First Name, Last name, Email address and telephone number. If you provide it, we will also store your company name and job title.
- 3.2. If you sign up to our newsletter, we will collect the same information as in the Request More Information option.
- 3.3. If you email us by clicking one of the links on our contact us page, we will store the email and its contents. The personal information will be the name you have in your email settings, your email address, and any information you share in the body of your email, plus some of the usual technical information that all email systems use to deliver your emails.
- 3.4. We use Google analytics to measure the performance and success of our website and to understand how it is used.
- 3.5. Google analytics is the most common tool websites use to measure website visits with browser information (e.g., Internet Protocol (IP) addresses and browser types) and how well websites are performing. Google analytics also uses cookies and we have detailed below the information in these cookies and how they are used in the Cookie Policy section of this policy.
- 3.6. If we collect data from you on this website the purpose of collecting this data is to:
 - a) Respond to your request for more information.
 - b) Subscribe you to our newsletter based on your request.
 - c) Enable you to contact us by email.
 - d) Analyse the performance and function of this website so we can continually improve it.

4. Cookie Policy

- 4.1. We use cookies on our website. Cookies are small text files that are downloaded onto your device when you visit a website.

Our cookies:

- Our web server
- Google Analytics
- Cookie Usage on Websites - read more here
- (<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>)

5. How long we will store your Data

- 5.1. By default, we will store your data for 13 months, or by client exception except for data that has been anonymised in accordance with applicable legislation. Unrequested personal or sensitive data sent by email will be erased.
- 5.2. Cookies can be stored on your computer for longer periods.



5.3. There may be conditions where we store your data for longer i.e., you have subscribed to our newsletter, our business relationship is continuing, or we have a services agreement between us.

6. Legal basis

6.1 We will only use your information where we have your consent and when you do not opt out from receiving our emails ('Soft opt in'), or we have another lawful reason for using it. These reasons include where we:

- a) Need to process the information to comply with a legal obligation.
- b) Believe the use of your information as described is in the public interest e.g. for the purpose of preventing or detecting crime.

7. Use of your data with third parties

7.1 As this is a The Company Website, your data may be shared within The Company and across parent group of companies in order to fulfil your request and provide the best service for you. The Company will not sell on your data on to third parties. As a business, The Company may share your personal data internally and with selected third-parties in the following circumstances:

a) Third-party service providers

In order to carry out your requests, respond to your inquiries, various other features, services, and materials available to you through our websites we share your personal data with third-party service providers that perform functions on our behalf (sub processors), such as companies that: process payments, analyse data, provide customer service and sponsors or other third parties that participate in or administer our promotions. They have access to personal data needed to perform their functions but may not use it for other purposes. Further, they must process this personal data in accordance with this privacy policy and as permitted by applicable data protection laws and regulations.

b) Other third-parties

Your personal data will also be used by us or shared with analytics companies or other third parties in connection with marketing, promotional, data enrichment and other offers, as well as product information.

c) Business transfers

Your personal data will be used by us or shared with The Company for internal reasons, primarily for business and operational purposes. As we continue to develop our business, we may sell or purchase assets, subsidiaries, or business units. In such transactions, your personal data generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, you consent otherwise). If another entity acquires us, our businesses or substantially all or part of our assets, or assets related to The Company's websites, your personal data will be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets.

The Company shares personal data internally or with third-parties for purposes described in this Privacy Policy. In most cases we will always try to ensure that any third party we use securely stores your data within the EEA.

If we do transfer personal data outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of the following safeguards:



- Transfer to a non-EEA Country whose privacy legislation ensures an adequate level of protection of personal data to the EEA one.
- Put in place a contract with the foreign third-party that means they must protect personal data to the same standards as the EEA.
- Transfer personal data to organisations that are part of specific agreements on cross border data transfers with the European Union.

8. Security of your personal information

8.1 The Company takes precautions including administrative, technical, and physical measures to safeguard your personal information against loss, theft, and misuse as well as unauthorised access, modification, disclosure, alteration, and destruction. We protect electronic data using a variety of measures including:

- a) Password access.
- b) Data backup.
- c) Encryption.
- d) Firewalls.
- e) Placing confidentiality requirements on employees and service providers and providing training to ensure that your personal data is handled correctly.
- f) Destroying or permanently anonymising personal information if it is no longer needed for the purposes it was collected.

9. Your Legal Rights in Respect of your Personal Information

9.1 You have legal rights in connection with personal information. Under certain circumstances, by law you have the right to:

- a) Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- b) Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- c) Right to be forgotten enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it and we have no legitimate ground for retaining such information. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- d) Object to processing of your personal information by us or on our behalf in certain situations.
- e) Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- f) The right to data portability: The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. Rights in relation to automated decision making and profiling: The GDPR provides safeguards for you against the risk that a potentially damaging decision is taken without human intervention. These rights work in a similar way to existing rights under the DPA. The right to lodge a complaint



with a Supervisory Authority. You have the right to lodge a complaint directly with any local Supervisory Authority about how we process your personal data.

- g) The right to withdraw consent. If you have given your consent to anything we do with your personal data (i.e., we rely on consent as a legal basis for processing your personal data), you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). You can withdraw your consent to the processing of your personal data at any time by contacting us on the details provided below.
- h) More detailed information on each of the rights can be found here: www.ico.org.uk/for-the-public/.

10. Social Media Apps

10.1 To help personalise your journey we may use Social Media Apps such as WhatsApp to process your queries however we do NOT use such platforms to take any personal / sensitive information such as your banking details. If you are unsure what personal / sensitive information is please refer to the [Information Commissioner's Office \(ICO\)](#).

11. Contact us

11.1 Please contact us if you have any questions about our privacy notice or the information, we hold about you.

11.2 The Company's Data Protection Officer can be contacted at DPO@wearewoven.com

12. Policy Compliance & Responsibilities

12.1 Compliance Measures

- a) Compliance with the above policy statements can be measured by example evidence, which will vary depending on the supporting standards and guidelines implemented to support this policy.
- b) Evidence of compliance can be presented in hard copy or electronic format.

12.2 Enforcement

- c) As noted above, this policy applies to all The Company employees, officers, management, and all consultants and contractors. Violations of this policy may result in disciplinary action, up to and including termination of employment and / or legal action.
- d) It is intended that this policy will be reviewed annually and that this process used to ensure the policy remains fit for purpose.

13. Document Management and Policy Compliance

13.1 This policy shall be deemed effective as of 01 September 2024. No part of this policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

13.2 For amendments to this policy email the Document Management Controller at risk&compliance@wearewoven.com



Appendix A – Glossary of Definitions

Term	Definition
“consent”	<p>Means the consent of the data subject which must be a freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which they, by a statement or by a clear affirmative action, signify their agreement to the processing of personal data relating to them.</p> <ul style="list-style-type: none">a) Consent is a clear indication by the data subject that they agree to the processing of their personal data. such a clear indication may take the form of a statement or a positive action. Silence, pre-ticked boxes, or inactivity are unlikely to amount to consent.b) Where consent is given in a document which includes other matters, the section dealing with consent must be kept clearly separate from such other matters.c) Data subjects are free to withdraw consent at any time and it must be made easy for them to do so. if a data subject withdraws consent, their request must be honored promptly.d) If personal data is to be processed for a different purpose that is incompatible with the purpose or purposes for which that personal data was originally collected that was not disclosed to the data subject when they first provided their consent, consent to the new purpose or purposes may need to be obtained from the data subject.e) If special category personal data is processed, The Company shall normally rely on a lawful basis other than explicit consent. if explicit consent is relied upon, the data subject in question must be issued with a suitable privacy notice in order to capture their consent. <p>In all cases where consent is relied upon as the lawful basis for collecting, holding, and/or processing personal data, records must be kept of all consents obtained in order to ensure that The Company can demonstrate its compliance with consent requirements.</p>
“data subject”	means a living, identified, or identifiable natural person about whom The Company holds personal data;
“EEA”	means the European Economic Area, consisting of all EU Member States, Iceland, Liechtenstein, and Norway;
“personal data”	means any information relating to a data subject who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that data subject;
“POL”	Policies



Term	Definition
“processing”	means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;
“special category personal data”	means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual life, sexual orientation, biometric, or genetic data.
“Sub-Processing”	A third-party data processor engaged by the processor ‘The Company SL’ who has or potentially will process Personal Data of customers.
“GDPR”	General Data Protection Regulation
“IP”	Internet Protocol
“DPA”	Data Protection Act 2018
“ICO”	Information Commissioner Office