



# White & Company PLC

## Data Privacy Statement

(Revision 1.5)

### Revision History

REVISION	DATE OPERATIONAL	CEO/BOARD APPROVAL	NEXT REVIEW	PREPARED BY & COMMENTS
1.0	13/12/2017	13/12/2017	08/2018	Mr. M. Corr - Original Draft
1.1	04/08/2018	03/08/2018	08/2019	Mr. M. Corr - Updated to include data sharing to USA
1.2	16/02/2019	15/01/2019	08/2020	Mr. M. Corr - Update in line with Industry Guidance
1.3	12/08/2020	11/08/2020	08/2021	Mr. M. Corr – Updated to include Video Surveys
1.4	07/02/2022	07/02/2022	02/2023	Mr. S. Shahi – Minor Updates
1.5	10/03/2022	10/03/2022	03/2023	Mr. S. Shahi – USCBP Link

## About us

White & Company takes your privacy very seriously. This Data Privacy Statement describes how White & Company collects and uses your personal data and sets forth your privacy rights.

We recognise that information privacy is an ongoing responsibility, and so we will from time to time update this Data Privacy Statement as we undertake new information security practices or use new technology to collect personal data, where it is appropriate.

We are a registered 'data controller' with the Information Commissioner's Office (registration number ZA458951).

## What we need to know about you and how we use that information

All our services require your personal data. Exactly what personal data we require varies on the service. However, most of our services require certain personal data. This typically includes:

- The full name of the customer;
- An email address and/or phone number for the customer; and
- The addresses where goods are collected from or delivered to.

Other personal information we may collect includes:

- Financial information (e.g. payment card information).

For private jobs, payment card information is provided directly by customers, either in person or via phone call, and entered into a PCI/DSS-compliant payment processing service. White & Company does not, itself, process or store payment card information. We use an online virtual payment terminal where transactions take place with our payment provider.

- Data collected by our website (e.g. web form enquiries).

We collect personal data submitted to us using our web enquiry form. Our website also collects certain information automatically and stores it in log files, for example internet protocol (IP) addresses. We use this information to help us design our site to better suit our users' needs.

Our website is maintained by Futurenet Publishing with whom White & Company has a Data Processing Agreement. Futurenet Publishing only handles personal data collected from White & Company's website at our instruction and this is only ever for statistical analysis purposes to inform our marketing team.

Our website uses Google Analytics. Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use and navigate the site.

A cookie is a small file which asks permission to be placed on your computer's hard drive. A cookie can't read data off your hard drive or read cookie files created by other websites. Cookies do not damage your system; they allow us to respond to you as an individual.

A cookie in no way gives us access to your computer or any information about you, other than personal data you choose to share with us.

The information generated by cookies about your use of our website (including your IP address) will be transmitted to and stored by Google on servers located in the UK. Google will use this information for the purpose of evaluating your website activity and internet usage, compiling reports on website activity for website operators and providing other services relating to website activity usage.

- Lead generation.

We purchase information about properties on the housing market from a lead generation company. They collect address information both directly from individuals and publicly available sources, for example, information about a property in the public domain includes whether it is 'for sale' or 'sold subject to contract'.

- Data collected via video conferencing software (e.g. Zoom).

When required we conduct surveys via video call with the full the agreement of the customer. These video calls are recorded allowing our surveyors to review the call when calculating volumes accurately, as this informs your quotation for the service. Video recordings of such surveys are stored securely in an encrypted format on 'Cloud' hosted servers and are retained for the appropriate duration required for the move. They are deleted after move completion or if the move fails to take place.

## **Sharing your information with our Partners**

The services we provide can involve a national or transnational supply chain. In these cases we share only the personal data they require. If this involves transferring information to a country not recognised by the Information Commissioner's Office as providing equivalent protection, we'll use additional safeguards where required.

Where the service you book with, or is allocated to, White & Company includes importing or exporting your possessions into or via the United States, U.S. Customs and Border Protection (CBP) will legally obtain the Vessel Manifest. This document includes some of the shipper's personal information, for example, the name and address to which the shipment is consigned and their passport number.

Personal Information contained within the Vessel Manifest is shared by US CBP with other commercial organisations. You can mitigate this risk, and we recommend you do so, by completing the US CBP online request for Electronic Vessel Manifest Confidentiality [here](#). By completing this form you are requesting that any Personally Identifiable Information is kept confidential.

## **Securing your personal information**

Recordings of video surveys are stored securely in an encrypted format on 'Cloud' hosted servers. All other data is stored on our on premise servers which are kept in a secure site and protected by threat detection software and hardware firewalls, preventing unauthorised access.

All our employees and third parties who require access must use multi-factor authentication to gain access to our servers. Employees are granted different privileges to ensure access to personal data is limited to a need-to-know basis.

We will store your personal data for the duration of the service. We retain personal data longer, only when we are legally obliged to do so. When it is no longer necessary to retain your personal data, we securely erase digital copies and shred any hardcopies.

## Your privacy choices and legal rights

Here are your privacy choices:

- You can choose to not provide us with personal information, in which case we will try to provide the service but it may be impossible.
- You can reject the use of cookies while browsing our website.

Here are your rights:

- You can access the personal information we hold about you.
- You can make us correct any of this personal information if it is inaccurate.
- You can object to receiving our direct marketing communications. You can do this by contacting us at [compliance@whiteandcompany.co.uk](mailto:compliance@whiteandcompany.co.uk).
- You can ask us to erase the personal information about you we hold and which is no longer necessary to delivering the service for you.
- You can complain about our handling of your personal information to the Information Commissioner's Office. (Please tell us first, so we have a chance to address your concerns.)

## Contact us

If you are a customer and wish to exercise your rights, please contact the Branch and Department you have been speaking with. If you prefer, you can contact us at [compliance@whiteandcompany.co.uk](mailto:compliance@whiteandcompany.co.uk) or write to us at:

FAO Compliance Team  
White & Company  
International House, Unit G  
Bar End Ind. Est.  
Winchester SO23 9NP

If you don't feel we've dealt with your request appropriately you have the right to lodge an appeal with the Information Commissioner's Office.