

## **Privacy and Cookie Policy**

### DATA PROTECTION POLICY

Who we are

Thank you for visiting the JD Relocation Services website.

#### Website Privacy and Cookie Policy

This privacy policy sets out how JD Relocation Services uses and protects any information that you give JD Relocation Services when you use this website so that you can make informed choices about how your information is collected and used.

Protecting consumer privacy is very important to JD Relocation Services, and we are committed to ensuring that your privacy is protected. We believe that information used responsibly benefits consumers and the economy, whether it is information we house on behalf of consumers conducting transactions or information we collect on behalf of our business clients.

Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement and compliance with the EU's General Data Protection Regulation (GDPR) 2018.

All our managers are responsible for ensuring their area and that reports comply with this Data Protection Policy. The Data Protection Officer is responsible for overseeing this Data Protection Policy and, as applicable, developing further related policies and guidelines.

JD Relocation Services may change this policy from time to time by updating this page. You should review this statement whenever you visit to obtain the most current statement. You may change your choices at any time.

This policy is effective from March 25, 2022, and is reviewed every three years.

### **What is covered in this policy**

JD Relocation Services is committed to doing what is right when it comes to the collection, use, and protection of your personal data. This privacy and cookies policy covers the following:

sets out the types of personal data that we collect.

explains how and why JD Relocation Services collects and uses your personal data.

explains when and why we will share personal data within the JD Relocation Services group and with other organisations.

explains your rights and choices when it comes to your personal data.

We want you to be clear about what this policy covers. This policy applies to you if you use our services.

### **Using our services means:**

shopping with us online, over the phone, or by using any of our websites or mobile applications.

This policy also applies if you contact us or we contact you about our products or services. Our business may need to collect and use personal data to provide you with products and services and for other purposes.

### **What personal data we collect and why we collect it**

When you choose to buy from us, you are entering into a contract. You can choose to make a one-off order as a guest without registering or to set up an account. Either way, for us to set this up, we will ask you to provide personal data. For customers ordering and checking out as a guest, we will only obtain transaction-based data.

### **We may collect the following information:**

name, title, and job title.

contact information including full postal address (billing and delivery), email address, and landline and mobile phone numbers.

orders and receipts

demographic information such as postcode, preferences, and interests.

payment information and IP addresses.

details of your visits to our site including, but not limited to traffic data, location data, weblogs and other communication data.

notes made during from conversations with you.

other information relevant to customer surveys and/or offers.

information regarding devices used whilst accessing our sites such as desktop, laptop, or mobile phone, which may also include your IP address.

### **Where we collect it from**

JD Relocation Services collects personal information in order to offer or provide goods and services to our customers. We may obtain this information from various sources:

directly from customer applications, questionnaires, and other materials submitted to us by customers.

from transactions in which JD Relocation Services and customers are involved.

from click-through activity on our websites.

from a variety of third-party sources, such as our business customers, government repositories, consumer reporting agencies and other financial institutions.

Comments

When visitors leave comments on the site, we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection. An anonymised string created from your email address may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is at <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

### **Media**

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

## **Contact forms**

When visitors contact us via our contact form, we collect the data submitted, and also the visitor's IP address and browser user agent string to help spam detection.

## **Embedded content from other websites**

Articles on this site may include embedded content, such as videos, images, and articles. Embedded content from other websites behaves in the same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

## **Analytics**

If our website is using Google Analytics, it collects information and JD Relocation Services' user and event data retention controls setting will be 50 months for data that is associated with user identifiers, including cookies and advertising ids. Google Analytics Data Retention controls set the amount of time before user-level and event-level data stored by Google Analytics is automatically deleted from Analytics' servers. You can opt out of Google Analytics by installing a Google Analytics opt-out browser add-on at the Google Analytics opt-out page (<https://tools.google.com/dlpage/gaoptout>).

## **What we do with the information we gather**

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

for internal record keeping.

to improve our products and services.

to send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

to contact you for market research purposes by email, phone, fax, or post.

to customise the website according to your interests.

How we use your personal data

Data protection states that we can only use or share your personal data obtained if and when we have a legitimate reason to do so. These can be:

**Contract:** The personal information provided to us allows us to complete our contractual agreement of processing and fulfilling your order. For sending emails, flyers with your deliveries on promotions, products and services we provide that may be of interest to you.

**Consent:** Your agreement for us to use your personal data in this way.

**Legitimate interests:** For JD Relocation Services to manage our business and provide our customers with the best products and the highest level of customer service and care. That is, transferring of your data to third-party delivery partners.

**Legal obligation:** Statutory or other legal requirements to share your information. That is, if requested to by law.

If you choose not to share your personal data with us or refuse certain contract permissions, it may result in us not being able to provide some services that you may require. That is, if we have no consent to contact you we may not be able to let you know when an out of stock item is back in inventory.

Reasons for using your personal information: Setting up your account.

Our reason for use: Legitimate Interest.

Our explanation of legitimate interest: For accurate and efficient processing of your details.

Reasons for using your personal information: Processing your order / payment.

Our reason for use: Fulfilling our contractual obligations / Legitimate Interest.

Our explanation of legitimate interest: Without this information we cannot process your order and comply with our contractual obligation. Payment processing securely by telephone via payment processing companies, such as Worldpay and PayPal.

Reasons for using your personal information: Notify you of your order status.

Our reason for use: Legitimate Interest.

Our explanation of legitimate interest: To be efficient in delivering updates on your order status throughout. To improve our service.

Reasons for using your personal information: Managing your account / customer service / queries / refunds / customer complaints. Including transfer to third-parties who undertake customer services, communication on our behalf. For stance, couriers.

Our reason for use: Legitimate Interest / Contractual Obligations / Legal Obligation.

Our explanation of legitimate interest: Handling customer contacts in an effective and efficient manner. Up-to-date record-keeping. We may keep your details for a reasonable time afterwards to fulfil obligations of refunds and similar activities. Help improve processes and services we provide. Comply with legal obligations or regulations.

Reasons for using your personal information: Marketing communications, online advertising, special offers, new lines and sales.

Our reason for use: Legitimate Interest.

Our explanation of legitimate interest: Improving customer interaction. Product and service development. Improve website look and functionality to attract and retain customers.

Reasons for using your personal information: Website and service enhancement notifications that may be of interest .

Our reason for use: Legitimate Interest.

Our explanation of legitimate interest: Improving customer interaction. Product and service development. Improve website look and functionality to attract and retain customers.

Reasons for using your personal information: Maintain network and security (Protect our business).

Our reason for use: Legitimate Interest.

Our explanation of legitimate interest: For the security of our network and to help maintain confidentiality and safety of your personal information stored by us. Update and safeguard your account. You may opt out of hearing from us by post or email communications.

Sharing your personal details with others

JD Relocation Services may work with trusted suppliers and businesses, such as delivery companies for the safe receipt of our goods, IT companies for our business website support, or payment processing services to provide an excellent level of customer service. Some examples of third parties with whom we may share your data include:

Delivery companies: To guarantee the safe delivery of your order/goods we supply delivery companies with limited information relevant to the delivery of your order. This could be your full name, address, contact telephone numbers, and notes provided by you relevant to delivery.

IT companies: These are businesses that design, help, and support our website and other business systems.

Payment processing companies: These could be trusted payment processing providers to take and manage your payments securely. We will only supply them with limited information relevant to the successfully process your payment.

Marketing companies: We may work with marketing companies to manage emails / electronic communications, surveys, and product review requests.

Social media sites / Google: This is to show products that may be of interest to you and is based on marketing consent and acceptance of cookies on our website.

Fraud management and prevention: We may ourselves, or if requested to by law enforcement bodies, process and share your personal data or information regarding fraudulent or potentially fraudulent activity to protect our business and to comply with laws in place to prevent fraud and money laundering. Fraud prevention agencies have a right to store your personal data for different periods of time. In some cases, they are permitted to hold your data for up to 6 years.

International transfer of your personal data out with the EU: Information provided to us by you may on occasion be transferred to a "third country" which is out with the EU. Although the personal data we hold is stored in the UK, on occasion our IT web designer and host may have to speak to IT departments located in other countries for support. We also work with partners/suppliers that may use cloud-hosted technology. Data security is key, and we ensure partners conform to appropriate accreditation. We will contractually ensure the confidentiality and security of your personal data at all times if and when we transfer any information out with the EU.

Your rights: Your personal data is protected by legal rights. You have a legal right to request for your personal data held by us to be erased, amended or to be made accessible to you. You can also object to the processing of your personal data by us.

### **How we use cookies**

JD Relocation Services uses cookies to ensure that we give you the best experience on our website. By using this website or closing this message, you agree to our use of cookies.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes, and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. However, declining cookies may prevent you from taking full advantage of the website.

### **Comments Cookies**

If you leave a comment on our site, you may opt-in to save your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will remain for 1 year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

### **Third-party tracking cookies**

We allow selected third parties who assist us with marketing to place cookies when you visit our site to assist us with target marketing of relevant ads. The sites we use are Google Analytics, Facebook Connect, and Google Tag Manager. You can opt out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on at the Google-Analytics-opt-out page (<https://tools.google.com/dlpage/gaoptout>).

### **Links to other websites**

Our website or mobile apps may contain links to other websites operated by other organisations that have their own privacy policies. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites, and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **How long we retain your data**

We keep your personal data for the duration of the period you are a customer of JD Relocation Services. We retain your data only for as long as necessary in accordance with applicable laws. On the closure of your account, we may keep your data for up to 6 years after you have cancelled your services with us. We may not be able to delete your data before this time due to our legal and/or accountancy obligations. We may also keep it for research or statistical purposes. We assure you that your personal data shall only be used for these purposes stated herein.

Period data held: The law requires us to hold personal data we have for a reasonable length of time (as stated above) or delete it sooner.

Exercise your rights: You have the right to request your data to be erased (where it applies). All data not permitted for any other reason or by law will be erased.

Bringing or defending a legal claim: We will retain your personal information for the duration of the proceedings and until we are sure no further appeals are possible.

Data retention of comments

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at

any time (except they cannot change their username). Website administrators can also see and edit that information.

### **What rights you have over your comments data**

If you have an account on this site or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

### **Where we send your comments data**

Visitor comments may be checked through an automated spam detection service.

### **How we protect the confidentiality of personal consumer information**

JD Relocation Services limits access to personal information to those employees of JD Relocation Services and its affiliates who need it to fulfil their business responsibilities.

Employees must adhere to JD Relocation Services privacy policies. Employees violating these policies may be subject to disciplinary action, up to and including dismissal.

Vendors and other outside contractors we engage are subject to our contractual requirements to ensure that sensitive personal information is safeguarded.

### **Our appropriate security safeguards**

We are committed to ensuring that your information is secure and have procedures in place to effectively detect, report, and investigate a personal data breach.

To prevent unauthorised access or disclosure, alteration or destruction, we use suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

The appropriate security safeguards may include encryption, physical access security, and other appropriate technologies. JD Relocation Services continually reviews and enhances its security systems.

### **Quality of information collected**

JD Relocation Services employs appropriate measures to assure the quality of information we collect directly from consumers.

Where JD Relocation Services collects information directly from consumers or sources other than our business customers, we permit them, if possible, to dispute or correct any erroneous or out-of-date personally identifiable information. Of course, this correction would not be possible if the information is proprietary to one of our business customers, reflects historical transaction information, or if correction would violate the privacy or legal rights of a third party. Where applicable, we abide by laws related to such information.

### **Controlling your personal information**

You may choose to restrict the collection or use of your personal information in the following ways:

whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes.

if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at the address below.

We will not sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

### **What are your rights over personal data held**

**Data Subject Rights:** You are entitled at any time to request any of the following information or amendments. For further detailed information, please visit the Information Commissioners Website at [www.ico.org.uk](http://www.ico.org.uk).

**Right of access:** The right to request full access to your personal information held by us and information relating to how we process this data.

**Right to rectifications:** The right to obtain without undue delay the rectification of inaccurate or incomplete personal data completed.

**Right to erasure ('right to be forgotten'):** The right to simply have your personal data held by us erased. To do this, contact us.

**Right to restriction of processing:** The right to restriction of processing of the processing of personal information.

**Right to data portability:** The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.

**Right to object:** The right to object to the processing of your personal data.

**Rights about automated decision making and profiling:** Automated individual decision-making (making a decision solely by automated means without any human involvement); and profiling (automated processing of personal data to evaluate certain things about an individual).

#### **Accessing and updating your data**

If you believe that any information we are holding on you is incorrect or incomplete, you can correct factual errors in your personally identifiable information by sending us a written request, by email or post to the address below, that credibly shows error. We reserve the right to independently verify claims. To protect your privacy and security, we will also take reasonable steps to verify your identity before making corrections. We reserve the right to assess a service charge for providing you with any information in connection with your request.

You have the right to access the information we hold about you. You may request details under the EU's General Data Protection Regulation (GDPR) 2018. A small fee will be payable. If you would like a copy of the information held on you, please write to the address below.

### **Our contact details**

JD Relocation Services  
Data Protection Officer (DPO)  
272 Bath Street, Glasgow, Lanarkshire, UK G2 4JR  
(44)(0)1506 204 700