

## **PRIVACY POLICY – WCF LTD SHAREHOLDERS**

**16<sup>th</sup> May 2018**

**Date of Next Review – April 2019**

WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN ("**We**", "**the Company**") are committed to protecting and respecting the confidentiality, integrity and security of the personal information we hold about each past or present shareholder ("**you**", "**your**").

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, and how we comply with our responsibilities under applicable data protection laws ("**Data Protection Laws**"). Please read this policy carefully and if you have any questions or concerns please contact us using the information below.

### **Data Controller**

For the purposes of the Data Protection Laws, the data controller of your personal information is WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN.

### **Personal data collection**

We only hold personal data about you which you have previously provided to us or may have been provided to us by a solicitor or other authorised representative.

### **Categories of personal data we may collect and hold**

We may collect the following information from our shareholders:

- name;
- contact details;
- Share certificate number; and
- bank account details

### **Purposes for which your personal data is used**

We will use the personal data which you provide to us for the following purposes:-

- allowing us to process sales, purchases and transfers of shares through the share ledger;
- making annual dividend payments;
- providing you with a copy of our Annual Report and Accounts;
- preparing statutory annual returns for Companies House;
- responding to your queries; and
- fulfilling our legal and fiduciary responsibilities.

If you do not provide us with your bank details then we may be unable to process your annual dividend payment or remit to you the proceeds of any disposals. We are legally required to verify your identity before processing the sale, purchase or transfer of any or all of your shareholding in WCF Ltd.

### **Legal basis for Processing**

In processing shareholder data WCF relies on the following legal bases:

- where it is necessary for the performance of our contract with shareholders;
- where it is necessary for compliance with our legal obligations; and
- where it is necessary for the purposes of WCF's legitimate business interests, which including maintaining direct, relevant and appropriate contact with our shareholders.

We may process shareholder data on more than one legal basis. Please contact us if you need details as to which legal ground we are relying on to process any specific item of personal data.

### **Disclosure of your personal data**

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose personal data to third parties who are providing services to us, in particular to the IT companies that support our share ledger system, to the mailing house that distributes the Annual Report and Accounts on our behalf and to our bank for the purposes of making payments to you.

We may also disclose personal data we hold to third parties:

- (a) in the event that we sell any business or assets, in which case we may disclose personal data we hold to the prospective buyer of such business or assets; and/or
- (b) if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party.

### **Access and other rights**

You may request to see the personal information we hold about you either digitally or on file at any point by making a request in writing to us via The Company Secretary, WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN or via email on [pam.murray@wcf.co.uk](mailto:pam.murray@wcf.co.uk). This request will be responded to within 30 working days. You will be provided with a copy of the personal information we hold about you. If we require more time to respond fully to any request, we will notify you in writing within the 30-day period referred to. Any additional copies of any information we provide to you may be subject to a reasonable fee.

You also have other rights under Data Protection Laws in relation to your personal data. In particular, you may have (i) the right to request that we rectify or erase information we hold about you in certain circumstances, (ii) the right to ask us to limit our processing of your information, (iii) the right (if we are processing information based on your consent, such as for marketing purposes) to withdraw your

consent, (iv) the right to object to certain processing of your information (including the right to object to processing of your personal data for direct marketing purposes at any time), (v) the right to ask us to move, copy or transfer your personal information to another organisation.

If you wish to exercise any of these rights, please contact us via the Company Secretary at Crawhall, Brampton, Cumbria, CA8 1TN or via email on [pam.murray@wcf.co.uk](mailto:pam.murray@wcf.co.uk).

### **Accuracy of personal data**

We try to ensure that the information we hold about you is accurate and kept up-to-date [by contacting you at regular intervals and asking you to confirm that this is the case, or if not, to provide us with updated details. However, if at any time you believe that any information we are holding about you is inaccurate, out-of-date or incomplete, please notify us via the Share Registrar at Crawhall, Brampton, Cumbria, CA8 1TN or via [shares@wcf.co.uk](mailto:shares@wcf.co.uk) as soon as possible. We will promptly correct or delete any information found to be incorrect.

### **Security**

We have put in place what we consider to be appropriate security measures against unlawful or unauthorised processing of the personal data we hold about you, and against the accidental loss of, or damage to, such personal data.

### **Transferring personal data outside the EEA**

We will not transfer any personal data we hold about you to a country outside the European Economic Area ("EEA") without notifying you in advance in writing.

### **Retention of data**

We will take all reasonable steps to destroy, or erase from our systems, personal data when it is no longer required. We intend to hold shareholder account number and address on our systems to allow us to cross check any share certificates produced and verify whether they remain valid.

Please note that it is your personal responsibility to hold your own records in respect of your share dealings for the purposes of income, capital gains and inheritance tax.

### **Third Party Links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **Changes to this policy**

We may make changes to this Privacy Policy at any time. Any changes we make will be posted on this page and, where appropriate, notified to you in writing. Please refer to this page regularly to see any changes or updates to this policy.

**Contact**

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to the Company Secretary, WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN or by email to [shares@wcf.co.uk](mailto:shares@wcf.co.uk).

**Complaints**

If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data in accordance with the Data Protection Laws you have the right to lodge a complaint at the Information Commissioner's Office (<https://ico.org.uk/>).