# **Privacy Policy**



Our websites provide a portal, or gateway, to the services offered by companies that make up and are associated with Be Group Holdings (UK) Limited, collectively referred to as "The Be Group". Current company and business operations within the group are Be Valued Ltd, Home Options Direct Limited, LMG Jewellery Ltd (LMG), Be2b and The Guild of Valuers and Jewellers (GVJ).

We are committed to protecting and respecting your privacy. This Policy sets out the basis on which any personal data that we collect from you or that you provide to us will be processed on our website. We retain certain basic information when you visit our website and recognise the importance of keeping that information secure and letting you know what we will use it for.

You are not required to provide any personal information to browse the public areas of this website. The term "website" includes this website and our associated sites and apps. However, you may choose to do so and provide us with information that is considered personal data. The term "personal data" as used in this policy refers to information such as your name, e-mail address, mailing address, telephone number or any other data that can be used to identify you.

## **Data Security and Confidentiality**

We take the security and confidentiality of your personal data very seriously. We use up-to-date data storage and security techniques to protect your personal information from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. We use computer systems with limited access protocols, housed in facilities using physical, electronic and procedural security measures to protect the confidentiality and security of information transmitted to us. We adhere to strict security standards to prevent any unauthorised access.

All processing of personal data and any third parties we engage to process your personal information are obligated to respect the confidentiality of your information. We keep your personal data only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal reporting or document retention requirements.

Your personal data is processed on the basis of your consent. In certain cases, if you withdraw your consent, we may have a legitimate legal basis for the continued processing of your data, provided that the respective legal requirements are met.

We collect, store, and use your personal data only for the purposes for which you submitted it and we keep the data only as long as it is necessary for those purposes or for other legitimate purposes that may apply. In these situations, if you choose to withhold any personal data requested by us, it may not be possible for you to gain access to certain parts of the site or for us to respond to your request.

The e-mail address that you supply when creating an account on this website may be used to contact you regarding your account. For example, if you forget your username or password and request assistance with logging in, assistance will be provided by means of a message sent to the e-mail address entered in your user profile.

The data provided is accessible to processors involved in the accomplishment of the purpose of data processing and/or to technical support specialists performing tasks related to the operation and maintenance of the technical system. We do not provide your personal data to anyone else unless (1) it is necessary to do so in order to provide the service requested by you and we have made a full disclosure to you; (2) we have a good-faith belief that disclosure of such information is reasonably necessary to satisfy any applicable laws or regulations; (3) it is in response to a request from law enforcement authorities; (4) it is needed to detect and prevent fraud for security or technical issues.

By providing your data you consent to our disclosing your personal data to third parties for these purposes only. Any personal data you submit will not under any circumstances be sold, traded or rented.

#### Your Rights

Whenever we process personal data, we take all reasonable steps to ensure that it is kept accurate and up to date for the purposes for which it was collected. You have the following rights regarding the personal data you have submitted to us:

- 1. You can request information about the collection and use of your personal information according to applicable laws.
- 2. You can request to access, correct, erase or block your personal information if it is incomplete or inaccurate.
- 3. Where you have legitimate grounds for doing so, you can object to the processing of your personal information and request us not to process your data further.

Upon contacting us, after you provide sufficient evidence of your identity and enough information to permit us to identify your personal data, we will fairly consider granting your request within one month. Should it take longer than this to grant a valid request we will update you accordingly. We will also notify any third-party recipients of the necessary changes.

Please note that your data may not be erased if processing is required by law or if the data may be kept on other legal bases. Requests to delete personal data are subject to any applicable legal reporting or document retention requirements imposed on us.

### **Notification of Changes to this Policy**

We are continually improving and adding new functionality and features to this website and improving and enhancing to our existing services. Because of these ongoing changes, as well as changes in the law and the nature of technology, our data practices will change from time to time. When it proves necessary to change our policy, we will post any changes on this page so that you are always aware of the information we collect and how we use it.

# Responsibility

The senior management team take full responsibility for data protection.

If you have any concerns, or wish to exercise any of your rights under the GDPR, you can contact us in the following ways:

FAO: Operations Manager, The Be Group, Technology Business Park, Moy Avenue, Eastbourne, BN22 8LD.

Alternatively, you can use the *contact us* form.

If you are not happy with the way we are handling your information, you have the right to make a complaint direct to the UK's data protection authority, the <u>Information</u> <u>Commissioner's Office</u> (ICO).