

This is the Privacy Notice of Clarity Computer (Distribution) Ltd.

Clarity Computer (Distribution) Ltd collects, uses and is responsible for certain personal data about you.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies in Ireland. Our use of your personal data is subject to your instructions, the GDPR, other relevant EU and Irish legislation and (where applicable) our contractual duty of confidentiality.

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

Key terms

It would be helpful to start by explaining some key terms used in this privacy notice:

Clarity, we, us, our	Shall mean Clarity Computer (Distribution) Ltd
Our Privacy Compliance Officer, PCO	Emily Garvey (data.protection@westcoast.co.uk)
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

How and why we use your personal data

If you provide personal data to us, we will collect and use it for the purposes set out below.

Under data protection law, we can only use your personal data if we have a lawful basis for doing so.

We have included our lawful basis for each use below.

What we use your personal data for	What personal data we collect	Our lawful basis
When you contact us with a query	Your name, email address and telephone number, and your company name and address.	Our legitimate interests in ensuring we can properly respond to your query.
During the registration process to create an account on our website	Your name, gender (if you choose to provide this) email address and telephone number, and your company name and address (Account Information)	For the performance of our contract with you or to take steps at your request before entering into a contract
To fulfil orders, provide distribution and sales services and product delivery to you (Order Fulfilment)	Your Account Information and your billing information, transaction and payment card information. Your contact history, purchase history and saved items.	For the performance of our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, including conducting credit checks	Your date of birth and a form of identification such as a copy of your passport. We may also check your information against third party records such as with your bank or building society, Companies Registration Office and Property Registry Authority.	To comply with our legal and regulatory obligations

Ensuring business policies are adhered to, e.g. policies covering security and internet use	Information from essential cookies and necessary website monitoring about how you use our website, IT, communication and other systems which may include your approximate location from your IP address (Website Information).	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures and so we can provide our service to you
Data enrichment and/or data matching by third parties to increase the effectiveness of marketing our goods and services	Your Account Information	For our legitimate interests to ensure we are sending marketing information about the goods and services on offer to the correct contact at our customers.
Operational reasons, such as improving efficiency, training and quality control	When you consent to our use of non-essential cookies, detailed information about how you use our website, IT, communication and other systems, including accounts you link to us, e.g. Facebook. See our cookies policy for further information.	With your consent to non-essential cookies so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	Your Account Information and Website Information.	For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information. To comply with our legal and regulatory obligations.
Ensuring safe working practices, business administration and risk assessments	Account Information and any information you provide to us when you visit our premises.	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.
Marketing our services and those of selected third parties to: -existing and former customers; -third parties who have previously expressed an interest in our services; -third parties with whom we have had no previous dealings.	Your name, email address, telephone number; your company name and address; your personal and professional interests; and your professional online presence.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers by email, text message, telephone or post. You have the right to opt out of receiving promotional communications at any time by contacting us by emailing: marketing.compliance@westcoast.co.uk .
When you respond to a survey	Your name, email address, telephone number and any information you provide to us in responding to the survey.	For our legitimate interests or those of a third party, e.g. to make sure we are working efficiently so we can deliver the best service to you.
Where you enter a promotion which we are running.	Your name, email address and any other personal data that forms a part of the promotion entry or administration requirements (this will differ depending on the promotion).	For our legitimate interests in administering the promotion.
CCTV and access control systems	Your image and vehicle registration number.	For our legitimate interests in ensuring our premises are secure.
Reporting Order Fulfilment details to the suppliers whose goods and/or services (Products) we sell to you	For you and any of your customers that we are completing Order Fulfilment for on your behalf: - Name - Email address - Business name - Business address	For the performance of our contract with you through: - Suppliers, whose Products you have purchased from us, completing any required registration of yourselves or your customers for these Products on our behalf. - Verifying to our suppliers you (i) participation in any co-sponsored marketing activity and (ii) eligibility for any agreed rebates.

If you do not provide personal data we ask for, it may delay or prevent us from providing our Products to you or disrupt those other purposes.

How your personal data is collected

We collect most of your personal data directly from you, be this in person, during your account application process and/or by telephone or written communication. However, we may also collect information:

- From publicly accessible sources, e.g. Companies House;
- Directly from a third party, including:
 - Credit reference agencies;
 - Customer due diligence providers;
 - Data enrichment service providers;
- From a third party with your consent, e.g. your bank or building society;
- From cookies following your use of our website. For more information on our use of cookies, please see our cookies policy [here](#);
- Via our IT systems, including the monitoring of our CCTV and access control systems.

Who we share your personal data with

We routinely share personal data with:

- other third parties where necessary to carry out your instructions to fulfil our contract with you, e.g. Delivery Partners, our group companies and the suppliers of the Products purchased by you from us;
- credit reference agencies, sanctions screening providers and customer due diligence providers to comply with our legal obligations, to enforce or apply our terms of use and other agreements, and to protect the rights, property, or safety of our employees, customers and others;
- our insurers and brokers to fulfil our agreements with them;
- external auditors, e.g. in relation to the audit of our accounts;
- our banks for the general administration of our business; and
- external service suppliers, representatives and agents that we use to make our business more efficient, e.g. marketing agencies for marketing campaigns or data matching exercises.

We only allow our service providers and Product suppliers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers and Product suppliers relating to ensuring they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Save as noted above, we will not share your personal data with any other third party.

Where your personal data is held

Information may be held at our offices and those of our group companies, third party agencies, service providers, Product suppliers, representatives and agents as described above (see '**Who we share your personal data with**').

Some of these third parties may be based outside the EU. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data out of the EU**'.

How long will your personal data be kept for?

We may keep your personal data after we have finished our contractual arrangements or interactions with you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law; and
- to reengage with you

We will not retain your personal data for longer than necessary for the purposes set out in this privacy notice. Different retention periods apply for different types of data. Further details on this are available and can be obtained by writing to data.protection@westcoast.co.uk.

When it is no longer necessary to retain your personal data, we will delete or anonymise it so that it can no longer be associated with you, and we may use this anonymised information indefinitely without notifying you. We use this anonymised information to improve the way we work and our services.

Transfer of your information out of the EU

Clarity is part of the Westcoast group and we share your personal data within the group. This will involve transferring your data outside the EU.

We may also have cause to transfer your personal data to one of our third-party partners who are based outside the EU, if they will be involved in the processing of your personal data. Whenever such a transfer occurs, we shall ensure that either the EU Commission has deemed such country to provide an adequate level of protection for personal data or that the transfer will be subject to specific contracts which are approved for use in the EU and afford personal data the same level of protection as required by EU law.

If you would like further information please contact us at data.protection@westcoast.co.uk (see 'How to contact us' below).

Cookies

A cookie is a piece of text that gets entered into the memory of your browser by a website, allowing the website to store information on your machine and later retrieve it. With your consent, we use cookies to ensure that we give you the best experience on our website. The cookies used by our site are not used for targeted marketing, only for website statistics and automation which will improve your browsing experience. For more information on our usage of cookies please click [here](#).

Your rights

Under the [GDPR](#) you have a number of important rights. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal data
- access to your personal data and to certain other supplementary information that this privacy notice is already designed to address
- require us to correct any mistakes in your personal data which we hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- withdraw your consent to us handling your personal data

For further information on each of those rights, including the circumstances in which they apply, see the [Data Protection Commissioner's guidance on your rights under the GDPR](#)

Please keep in mind that privacy law is complicated, and these rights will not always be available to you all of the time.

If you would like to make a request to exercise any of those rights, please:

- email, call or write to our Privacy Compliance Officer (details below);
- let us have enough information to identify you (e.g. account number, user name, registration details);
- provide us with proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

If you would like to unsubscribe from any email newsletter you can also click on the 'unsubscribe' button at the bottom of the email newsletter or contact us at marketing.compliance@westcoast.co.uk. It may take up to 20 working days for this to take place.

Keeping your personal data secure

We have appropriate security measures in place to endeavour to prevent personal data from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data are instructed to do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that this privacy notice can resolve any query or concern you raise about our use of your information.

If you have any further queries or would like to make a complaint, please contact us using the information below (see **How to contact us**).

The [GDPR](#) also gives you right to lodge a complaint with the supervisory authority in Ireland, which is the Data Protection Commissioner who may be contacted at <https://dataprotection.ie/en/individuals/exercising-your-rights/raising-concern-commissioner> telephone: 01 7650100 / 1800437 737 . If you are based in an EU state other than Ireland, you can find your relevant supervisory authority [here](#) and if in the UK then [here](#).

Changes to this privacy notice

This privacy notice was published on 31 March 2023 and last updated on 27 June 2024.

We may change this privacy notice from time to time. You should check this privacy notice occasionally to ensure you are aware of the most recent version.

How to contact us

Please contact our Privacy Compliance Officer if you have any questions about this privacy notice or the personal data we hold about you by:

- **Email:** data.protection@westcoast.co.uk
- **Post:** CLARITY COMPUTER (DISTRIBUTION) LTD C/O EMILY GARVEY, WESTCOAST LIMITED, ARROWHEAD PARK, ARROWHEAD ROAD, THEALE, READING, RG7 4AH
- **Phone:** 0118 912 6000