

# PRIVACY POLICY

## 1 Digital Destiny Ltd customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

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## 2 Contact details

Post: c/o Scrutton Bland Ltd, Fitzroy House, Crown Street, IPSWICH, Suffok, IP1 3LG

Telephone: 020 3051 3453

Email: [info@cwpuuk.org](mailto:info@cwpuuk.org)

## 3 What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery:**

- Names and contact details
- Addresses
- Purchase or account history
- Credit reference information
- Account information
- Information relating to loyalty programmes
- Website user information (including user journeys and cookie tracking)
- Call recordings

We collect or use the following information for **the operation of customer accounts and guarantees:**

- Names and contact details
- Addresses
- Purchase history
- Account information, including registration details

- Marketing preferences

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Purchase or viewing history
- Website and app user journey information

We collect or use the following information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Call recordings
- Customer or client accounts and records
- Financial transaction information
- Correspondence

## 4 Lawful bases and data protection rights

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

## 5 Where we get personal information from

- Directly from you
- Publicly available sources
- Market research organisations
- Credit reference agencies
- Providers of marketing lists and other personal information

## 6 How long we keep information

We keep your personal information for as long as you contract with us for services, for as long as legally necessary or if you do not contract with us for as long as we need the information.

## 7 Who we share information with

Others we share personal information with

- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- Professional consultants

## 8 How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us.

v1.0 - Effective from 1 June 2026