



Privacy Policy

Who we are

TrueStock is a trading name of Effidac Ltd. (Company Number NI657443) which is the controller and responsible for your personal data (collectively referred to as "TrueStock", "the company" "we", "us" or "our" in this privacy policy).

What is Personal Data?

In the EU's General Data Protection Regulation (GDPR), Personal Data is defined as *"...any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person."*

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below
 - Technical Data from the following parties:
 - (a)analytics providers such as Google based outside the EU;
 - (b)advertising networks; and
 - (c)search information providers.

- Contact, financial and transaction data from providers of technical, payment and delivery services.
- Identity and contact data from data brokers or aggregators.
- Identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Why do we need to collect and store personal data?

The following privacy policy will outline how we will collect, store and use your data. This is done so that we can:

- Respond to your queries and information requests;
- Generate sales forecasts
- Assist in inventory management
- Respond to service requests;
- Respond to any complaints;
- Conduct market analysis and to improve your customer experience;
- Store contact details of our customers or potential customers, including but not limited to contact name, postal address, telephone, email address (if provided), your query with us, relationship to us, including information recorded through application forms, complaints, etc. on our database; and
- Refine our website and improve your experience when using it through cookies.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our

you and measure or understand the effectiveness of the advertising we serve to you	(c) Profile (d) Usage (e) Marketing and Communications (f) Technical	products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Consent

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

How we use and store your information

In order for us to do any of the above, we must collect and store your data. We will ensure that the information collected will only be used for its intended purpose and does not constitute an invasion of your privacy.

Processing data constitutes as collecting, storing and using. We will process this data in accordance with the GDPR. We will do our utmost to keep your information accurate and up to date and not keep it longer than is necessary. TrueStock will issue occasional reminders to all members to keep their contact details up to date and will update them accordingly. This is necessary for us to perform the contract that we are about to enter into or have entered into with you.

The personal data that we collect through this website will be added to our Database. In this regard we may use your personal data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Please be advised that there is information that we are required to keep in accordance with the law, such as information needed for tax and audit purposes. Personal data may be held for longer than these periods, however this will depend on the individual needs of the company.

We use appropriate technical and organisational measures to store your data securely including but not limited to:

- Forced HTTPs and SSL;
- OAuth2.0 Authentication;
- Encryption end to end;
- Password protection;
- Password reset functionality;
- Password hashing;
- Automated nightly backups of database;
- Encrypted servers protected within a private network not accessible to public firewalls;
- Load balancers;
- AWS Cloud Security; and
- Protection against common vulnerabilities including:
 - DDoS protection;
 - Cross site scripting (XSS) protection;
 - Cross site request forgery (CSRF) protection;
 - SQL injection protection;
 - Clickjacking protection;
 - Host header validation;
 - Referrer policy; and
 - Session security.

Under what circumstances will we contact you?

We will only ever contact you when necessary, or when you have requested that we do so. We do not mean at any point to be intrusive or ask for unnecessary information. We will do our best to ensure that the information we hold is as secure as possible to minimise the risk of unauthorised access or disclosure.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original

purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Will we share your personal data with anyone else?

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Service providers acting as processors based within the territories of the EU and United Kingdom who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- To provide better customer service we share data with Google Analytics, Sumologic and Hubspot.
- In order to deliver you with market insights we also anonymise your sales data with other TrueStock users' data. These market insights can be viewed by other TrueStock users.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Can you find out about the personal data that we hold about you?

If you want to see what personal data, we hold on you and how it is processed, you may contact us to request this. This is known as a Data Subject Access Request (DSAR) and you must request this in writing (either by post or email), providing the necessary identification before any information is released. If TrueStock do store any of your personal data, you may request information on the following:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the GDPR owner, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of TrueStock or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing or transfer your data to a

third party.

- Information about your right to withdraw consent at any time.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

What forms of ID will you need to provide in order to access this?

TrueStock will accept the following forms of ID when information on your personal data is requested:

Passport; Photo Driving Licence; Utility Bill (from the last three months); Notarised ID Document;

Contact details of the GDPR Owner

If you wish to submit a DSAR, or have any questions regarding this privacy statement, you must do so in writing using the following information.

Address: 18 Ormeau Avenue, Belfast, Antrim, United Kingdom, BT2 8HS

Email: security@truestock.io

Telephone: +442039208304

Use of cookies on this site

To make this site simpler, small data file are placed on your computer. These are known as cookies. Most big websites do this too.

They improve things by:

- remembering settings, so you don't have to keep re-entering them whenever you visit a new page;
- remembering information, you've given (e.g. your postcode) so you don't need to keep entering it;
- measuring how you use the website so we can make sure it meets your needs.

Our cookies aren't used to identify you personally. They're just here to make the site work better for you. Indeed, you can manage and/or delete these small files as you wish.

You can opt out of Google Analytics cookies for all sites. To learn more about cookies and how to manage them, visit AboutCookies.org.

1) First Party Cookies

These are cookies that are set by this website directly.

We use Google Analytics to collect information about how people use this site. We do this to make sure it's meeting its users' needs and to understand how we could do it better. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. We do not use cookies to collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

There are also cookies that store basic data on your interactions with WordPress, the CMS running this website.

2) Third Party Cookies These are cookies set on your machine by external websites whose services are used on this site. Cookies of this type are the sharing buttons across the site allow visitors to share content onto social networks. Cookies are currently set by Twitter, Facebook and Google+. If you want to prevent sites setting third party cookies, instructions to do so are [here](#).

3) Log Files

Log files allow us to record visitors' use of the site. These logs are automatically generated from all our visitors, which we use to make improvements to the layout of the site and to the information in it, based on the way that visitors move around it. Log files do not contain any personal information about you.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Name	Purpose
Shopify Authentication	shopifyAuth	Recognise you when you return to our site.
Forecast Horizon	forecastHorizon	Allow you to use our site in a way that makes your browsing experience more convenient, for example, by allowing you to store items in an electronic shopping basket between visits. If you register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.
Authentication	auth	Recognise you when you return to our site.

Links to other websites

Our website contains links to our partners, as well as other external sites. You should note, that if you click through to any of these external sites, we do not have control over that site (unless it is a website which forms part of the TrueStock Group of companies.) We cannot be responsible for the protection of any information that you provide to these other websites as they are not governed by this privacy statement. You should always exercise caution and look at the privacy statement of whichever website it is that you are visiting.

Policy Changes

TrueStock reserves the right to change this privacy policy and will post any revisions on this web site. Your continued use of this web site will be subject to the then-current privacy policy.