

Arrow Group Privacy Notice

Revised: October 2023

Who We Are

Arrow Business Communications Limited (Arrow) and its affiliated subsidiaries, trading under the brand name ARO ('we' or 'us', "the Arrow Group" or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data. This notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

Arrow's registered office is at The Wharf, Abbey Mill Business Park, Lower Eashing, Godalming, Surrey, GU7 2QN and Arrow is a company registered in England and Wales under company number 5643503. Arrow is registered on the Information Commissioner's Office Register of Data Controllers under registration number Z9552844, and act as both a data controller and data processor. Our designated Data Protection Officer/Appointed Person for the Group can be contacted at: The Wharf, Abbey Mill Business Park, Lower Eashing, Godalming, Surrey, GU7 2QN.

Information That We Collect

The Arrow Group processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

The personal data that we collect from you is:

- Name
- Business Email
- Work Telephone Number
- Mobile Telephone Number

We collect information in the below ways:

- Online form
- Telephone conversations
- Emails

How We Use Your Personal Data (Legal Basis for Processing)

The Arrow Group takes your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw consent at any time. The purposes and reasons for processing your personal data are detailed below:

- We collect your personal data for the performance of a contract and to provide our service to you and to ensure that orders are completed and can be sent out to your preferred address and to provide customer support.
- We may collect information about your calls to our contact centre, including a recording of such call and information about your orders for goods or services. Telephone calls into and out of our contact centres are recorded for the purposes of training and monitoring our staff and verifying

your order. We record telephone calls where this is necessary for entering into a contract, or negotiating a contract, with you, or for our legitimate business interests.

- We store your personal data as part of our legal obligation for business accounting and tax purposes and may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency as part of these legal obligations.
- We store your personal data for the purposes of providing you with information about Arrow's products and services. We may receive information about you from other sources including when we use third party providers to assist us with financial verification checks when you are seeking to open a credit account with us and/or from third party vendors if we use customer lists from such third parties and from other third parties who work with us in connection with our goods or services.

Your Rights

You have the right to access any personal information that the Arrow Group processes about you and to request information about: –

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible, unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use. You also have the right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. The Arrow Group uses third parties to provide the below services and business functions, however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures. If the Arrow Group receives a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies.

- IT Systems and Services
- Debt Collection Services
- Credit Reference Agencies
- Direct Marketing Services
- Service Support Providers
- Platform Providers
- Product Suppliers

Safeguarding Measures

The Arrow Group takes your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including encryptions and password protection.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to the Arrow Group however, as this information is required for us to provide you with our services and deliver your products, we will not be able to offer some/all of our products or services without it.

How Long We Keep Your Data

The Arrow Group only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 7 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise, withdraw your consent or the data will automatically be erased three years after the last communication.

Calls may be recorded and in the event that they are, call recordings shall be retained for a period of up to 7 years for training and evidential purposes.

Promotions & Offers (if applicable)

Occasionally, the Arrow Group would like to contact you with details of the products and services that we provide. If you consent to us using your contact details for these purposes, you have the right to modify or withdraw your consent at any time by using the opt-out/subscribe options or **click on the "unsubscribe" link in any such emails that we send to you** or by contacting the Arrow Group directly at the contact details below.

If you consent to us contacting you with the above-mentioned marketing and offers, please tick to say how you would like us to contact you: –

Post Email Telephone SMS No Communications

Changes to our Privacy Policy

This privacy policy can be changed by us at any time. If we change our privacy policy in the future, we will advise you of material changes or updates to our privacy policy by email, where we are holding your email address.

Lodging A Complaint

The Arrow Group only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Data Protection Officer
Arrow Business Communications Limited
1st Floor, The Wharf
Abbey Mill Business Park

Lower Eashing
Godalming
GU7 2QN
Tel: 0330 440 4444
Email: dpo@aro.tech

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF