

Privacy Policy

Introduction

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you how we look after your personal data before, during and after trading with us (either as a supplier or a customer) and will tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this policy.

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Important Information & Who We Are

Purpose of This Policy

This policy aims to give you information on how we collect and process your personal data.

It is important that you read this policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

The Sterlingham Company Ltd (TSCL) is the controller and are responsible for your personal data (collectively referred to as “we”, “us”, or “our” in this policy).

The Managing Director of the company has been appointed data privacy manager and is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this policy, including and requests to exercise your legal rights, please contact the data privacy manager using the details set out below:

Contact Details

Name or title of data privacy manager: Andrew Healey
Email Address: Andrew.healey@sterlingham.co.uk
Postal Address: Units 2 & 2A Stamford Street, Amblecote, Stourbridge, DY8 4HR
Telephone Number: 01384 370901

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.

Changes to The Privacy Policy & Your Duty to Inform Us of Changes

The data protection law in the UK will change on 25th May 2018. Although this policy sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests until this date as we are still working towards getting our systems ready for these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your employment with us.

The Data We Collect About You

Personal data (or personal information), means any information about a living individual where that individual can be identified using all or part of that information. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of information about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title and gender.
- **Contact Data** includes address (where you are a sole trader this may be personal), email address and telephone numbers.
- **Financial Data** includes bank account number, sort code, account name and bank name and address.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us or we have purchased from you.
- **Technical Data (customers only)** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your quotation requests, interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect and use **Aggregate Data** such as statistical or demographic data for any purpose. Aggregate Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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 and information about criminal convictions and offences.

If You Fail to Provide Personal Data

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 which we have or are trying to enter into with you (for example, to provide you with goods). In this case we may be forced to having to cancel any agreement of contract with you but we will notify you if this is the case at any time.

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:
 - Registering an account on our website
 - Placing an order for our products
 - Accepting a purchase order from us
 - Requesting marketing to be sent to you
 - Giving us feedback
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical data from analytics providers, for example, we use a third-party service, Google Analytics, to collect standard internet log information about and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of our website. This information is processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be upfront about this. We will make it clear when we collect personal information and will explain what we intend to do with it.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.
 - Identify and Contact Data from publicly available sources such as Companies House and Electoral Register based inside the EU.
 - Identity and Contact Data from publicly available sources such as LinkedIn, Facebook, Twitter and various search engine search results.

How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform our duties as per the contract we are about to enter into or have entered in to with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.
- Where we need to obtain credit reference checks.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by following the link provided in all marketing communications or by contacting us directly.

Purpose for Which We Will Use Your Personal Data

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	a. Performance of a contract with you

<p>To process and deliver your order including:</p> <ul style="list-style-type: none"> a. Manage payments, fees and charges b. Collect and recover money owed to us 	<ul style="list-style-type: none"> a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications 	<ul style="list-style-type: none"> a. Performance of a contract with you b. Necessary for our legitimate interests (to recover debts due to us)
<p>To manage our relationship with you including:</p> <ul style="list-style-type: none"> a. Notifying you about changes to our terms or privacy policy b. Asking you to leave a review or take part in a survey 	<ul style="list-style-type: none"> a. Identity b. Contact c. Profile d. Marketing and Communications 	<ul style="list-style-type: none"> a. Performance of a contract with you b. Necessary to comply with a legal obligation c. Necessary for our legitimate interest (to keep our records updated and to study how customers use our products/services)
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> a. Identity b. Contact c. Technical 	<ul style="list-style-type: none"> 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 reorganization or group restructuring exercise) b. Necessary to comply with a legal obligation
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications f. Technical 	<ul style="list-style-type: none"> a. Necessary to our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
<p>To use data analytics to improve our website, products/services, marketing and customer relationships and experiences</p>	<ul style="list-style-type: none"> a. Technical b. Usage 	<ul style="list-style-type: none"> a. Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updates and relevant, to develop our business and to inform our marketing strategy)
<p>To make suggestions and recommendation to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> a. Identity b. Contact c. Technical d. Usage e. Profile 	<ul style="list-style-type: none"> a. Necessary for our legitimate interests (to develop our products/services and to grow our business)
<p>To order a product of service from you</p>	<ul style="list-style-type: none"> a. Identity b. Contact c. Financial d. Transaction 	<ul style="list-style-type: none"> a. Performance of a contract with you

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can contact us at any time to request a change in your contact preferences via info@sterlingham.co.uk

Promotional Offers from Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third Party Marketing

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

Opting Out

You can ask or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

Data is occasionally gathered through cookies which are stored on the hard drive of your computer. Cookies are helpful to us because they allow us to provide you with a more personal service. For example, on our website when you choose to view measurements or weights in Imperial or Metric a cookie will be used to store that information so that next time you come on our website it will automatically display dimensions in the option you chose.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Change of Purpose

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 and/or related to the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with and/or related to 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.

Disclosures of your Personal Data

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

- External Third Parties as set out in the Glossary
- 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.

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.

International Transfers

Some of our External Third Parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

We will only transfer data outside of the EEA where it is compliant with data protection laws and the means of transfer providers adequate safeguards in relation to you date, for example:

- By way of data transfer agreement, incorporating the current standard contractual clauses approved by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- By ensuring that any US-based organizations we transfer data to have signed up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from the EEA to the United States of America (or ensuring that any equivalent framework agreement is in place respect of other jurisdictions); or
- By transferring your data to a country whose data protection laws have been found to be adequate by the European Commission; or
- Where you have expressly consented to the data transfer (having been informed of any relevant risks involved)

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

Data Retention

How Long Will You Use My Personal Data For?

By law, for tax purposes, we have to keep basic information about our customers (including Contact, Identity, Financial, and Transaction Data) for seven years after they cease becoming customers.

In some circumstances you can ask us to delete your data: see "Request Erasure" below for further information.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request Access to your Personal Data
- Request Correction of your Personal Data
- Request Erasure of your Personal Data
- Object to Processing of your Personal Data
- Request Restriction of Processing your Personal Data
- Request Transfer of your Personal Data
- Right to Withdraw Consent

If you wish to exercise any of the rights set out above, please contact us.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need from You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

Glossary

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most securing experience. We make sure we consider and balance any potential impact on your (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means by processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

External Third Parties:

- Service providers such as our Accountants based in the UK who provide financial administration and accountancy services.
- Service providers such as MailChimp acting as processors based in the US who provide marketing services.
- Service providers such as Clent View Carriers, and World Options based in the United Kingdom who provide courier and/or delivery services.
- Professional Advisors including lawyers, bankers, auditors, healthcare professional, and health and safety executives who provide consultancy to our company.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place.

Your Legal Rights

You have the right to:

- **Request Access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request Correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request Erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data’s accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to perform to the clauses of our mutual contract with you. We will advise you if this is the case at the time you withdraw your consent.

Document Owner and Approval

The Managing Director is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on the company network and is published in the main office.

This policy was approved by the Board of Directors on 8th May 2018 and is issued on a version control basis under the signature of the Managing Director.

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial Issue	A.Healey	08/05/2018