

# **PINEFIELD GLASS LTD SUPPLIER PRIVACY POLICY**

## **1. IMPORTANT INFORMATION**

Pinefield Glass Ltd is committed to protecting the privacy and security of your personal information. This privacy policy aims to give you information about how we collect and process your personal data and applies to anyone who supplies us with any product, service and/or uses our website.

It is important that you read this privacy notice in conjunction with any other related notices which we may issue on specific occasions relating to how we process your personal data.

## **2. THE KIND OF INFORMATION WE COLLECT ABOUT YOU**

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The personal information we collect, store and use includes some or all of the following.

- Individuals Name
- Company Name/Trading Name
- Company Registered Address
- Company Trading Address
- Individuals Address
- Company Registration Number
- Company VAT Registration Number
- Bank Details
- Contact Names
- Contact Telephone Numbers
- Contact email Addresses
- Supply History

It is important that the personal data we hold is accurate and current. It is your responsibility to keep us informed if your personal information changes during your relationship with us.

## **3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about you directly from you at the time we engage your services and, where required, from third party credit referees and credit checking agencies.

We may collect additional personal information in the course of our contract with you in order to use your products and services during the period of your contract with us.

If you fail to provide certain information when requested, we may not be able to enter into the contract with you.

## **4. HOW WE WILL USE YOUR PERSONAL DATA**

We will use your personal information in the following circumstances.

- To enter into a contract with you.
- To comply with legal obligations.
- Where we have your consent.
- Where it is necessary for our legitimate interests and/or your legitimate interests and fundamental rights do not override those interests

We may also use your information in the following situations.

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

### **Automated Decision Making**

We do not use automated decision making. If we introduce this process, we will notify you in writing giving 30 days notice.

## **5. DATA SHARING**

We may have to share your personal data with third parties including third party service providers and other entities in our group. We require these parties to respect the security of your data and to treat it in accordance with the law.

We will not generally transfer your personal information outside the EU but, if we do, you can expect a similar degree of protection in respect of your personal information.

### **Sharing Personal Information With Third Parties**

We will share your information with third parties where required by law, where it is necessary to administer our contract with you or where we have another legitimate interest in doing so.

Third parties include other entities within our group and third party service providers (including our customers), such as but not limited to:

- Our accountants
- Credit reference and fraud agencies
- Our legal representatives
- Our customers

All our third party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policy. We do not allow our third party service providers to use your personal information for their own purposes. We only permit them to process your personal data for specific purposes and in accordance with our instructions.

Our website may include links to third party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **6. DATA SECURITY**

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

We will notify you of any suspected data security breach along with the applicable regulatory body where we are legally required to do so.

## 7. DATA RETENTION

### How long will your information be kept

We will only retain your personal information for as long as is necessary to fulfil the purposes for which we collected it including for the purposes of satisfying any legal, accounting, reporting or guarantee requirements.

To determine the appropriate retention period for personal data we consider the amount, nature and sensitivity of the personal information, the purpose for which we processed it and whether we can achieve those purposes through other means and the applicable legal requirements.

By law we have to keep basic information about our suppliers including contact, identity, financial and transaction data for seven years after you cease being our supplier for tax purposes.

## 8. RIGHTS OF ACCESS, CORRECTION, ERASURE, RESTRICTION AND TRANSFER

Under certain circumstances, by law, you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information 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 information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below). Please note that we may not always be able to comply with your erasure request for specific legal reasons, which will be notified to you if applicable, at the time of your request.
- **Object to processing** of your personal information 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 those grounds. You may also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds for processing information which override your rights and freedoms.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you in the following circumstances. (a) If you want us to establish the data’s accuracy. (b) Where our use of the data is unlawful but you do not want us to erase it. (c) Where you need us to hold the data even if we no longer require it as you need to establish, exercise or defend legal claims. (d) 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 information to another party. We will provide to you, or a third party you have chosen, your personal data in writing.

If you wish to review, verify, correct or request erasure of your personal information, object to the processing of your personal information or request that we transfer your personal information to another party, please contact the Data Protection Team in writing.

## **Fees for Data Subject Access Requests**

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

## **What we will need from you**

We will need to request specific information from you to help us confirm your identity and ensure your right to access the information or exercise any of your other rights. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **9. RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent for collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw consent, please contact our Data Protection Team in writing. Once we have received notification that you have withdrawn consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate reason to do so in law. Please note that if you withdraw your consent, this will not affect the lawfulness of any processing carried out before you withdrew consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## **10. DATA PROTECTION TEAM**

We have appointed a Data Protection Team to oversee compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact the Data Protection Team.

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. We would however appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance.