# **Privacy Statement**

Windale Furnishings Ltd are committed to protecting and respecting any personal information you share with us.

This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

We will always give you the option not to receive marketing communications from us. We will never send you unsolicited 'junk' email or communications, or share your data with anyone else who might. We do not sell your information to third parties, but we do work closely with selected partners who help us to provide you with the information, products and services that you request from us.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

This version of our Privacy Statement is live from 24th April 2018.

# What information do we collect?

We collect information about you and your business when you engage with our website, or our other sales routes. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

We collect information about you or your business when you use Windale's websites and our other sales platforms.

The information we collect includes some or all of the following:

- 1. Name (including title);
- 2. Address;
- 3. Phone number;
- 4. Email address;
- 5. Products of interest;
- 6. Type of customer (for example, end-user, wholesaler, agent, etc.)
- 7. The date and time you used our services;
- 8. Cookie, Pixels or Beacon information (for more information please see our Cookie Policy);
- 9. Details of any transactions between you and us;
- 10. Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses), company details (some of which we may obtain from an online or public business directories); and
- 11. Any information within correspondence you send to us.

#### How do we use this information?

Windale Furnishings Ltd will only process information that is necessary for the purpose for which it has been collected. You will always have the option not to receive marketing communications from us (and you can withdraw your consent or object at any time). We will never send you unsolicited 'junk' email or communications, or share your personal information with anyone else who might.

There are various ways in which we may use or process your personal information. We list these below:

### Consent:

Where you have provided your consent, we may use and process your information to contact you from time to time about promotions, events, products, services or information which we think may be of interest to you (don't worry, we won't bombard you);

You can withdraw your consent at any time by contacting us at Windale Furnishings Ltd Unit 2 Hassall Road Skegness LincoInshire PE25 3TB or, in relation to any marketing messages you receive, by using the unsubscribe option included in those messages.

### **Contractual performance**

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us.

### **Legitimate Interests**

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support customers with sales and other enquiries

- 1. To respond to correspondence you send to us and fulfil the requests you make to us (for example: registering interest in upcoming products, auction information requests or information about specific products);
- 2. To provide product support and services (for example where warranties may be applicable);

Processing necessary for us to respond to understanding customers' and drivers' needs

- 1. To analyse, evaluate and improve our products and services so that your visit and use of our website are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally);
- 2. To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services that we think you will be interested in. We will only send marketing communications to you if you have provided your consent for us to do so or which we have obtained in the ways mentioned in the paragraphs below;
- 3. In some cases we may use automated methods to analyse, combine and evaluate information that you have provided to us. We collect and analyse this information in this way so that we can deliver the most appropriate customer experience to you by tailoring and making relevant all our service and communications;

Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns

- 1. To send you marketing information from time to time after you have registered at an auction or purchased a product from us or made a purchasing enquiry, closed your browser with items in your shopping basket or requested a brochure or other information of interest. We will only contact you with information about our own products and services (and in ways the law allows), which we hope you will like. You have the right to object to us sending you this information at any time;
- 2. To contact you from time to time with marketing information (unless you object) if you have expressly indicated to us that you are acting on behalf of a business or where we have obtained your business contact details from an online or public business directory. In

relation to any such information we send by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing;

- 3. To contact you with targeted advertising delivered online through social media and other platforms operated by us, unless you object. You may receive advertising based on information about you that we have provided to the platform. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us;
- 4. To identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information);
- 5. To administer competitions and promotions that you enter with us from time to time and to distribute prizes;

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

- 1. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer;
- 2. For network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;
- 3. To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- 4. To inform you of updates to our terms and conditions and policies.

### Legal Obligation

We may process your personal information to comply with our legal requirements.

#### How do we share this information?

We do not sell your information to third parties.

We will not share your information with third parties. The information we hold about you will only be used by Windale Furnishings Ltd for the purposes of Windale's business.

#### How long do we keep your information for?

We will not retain personal information in an identifiable format for any longer than is necessary.

If we have a relationship with you (e.g. you are a customer or registered to view our auctions), we hold your personal information for 6 years from the date our relationship ends. We hold your personal information for this period in accordance with legislation surrounding maintaining accounting records.

Where we have obtained your personal information following a request for information, brochure, quotation, auction registration or any other information on any of our products or services, we hold your personal information for 4 years from the date we collect that information, unless during that period we form a relationship with you e.g. you purchase a product. We hold your personal information for this period to give us an opportunity to form a relationship with you.

The only exceptions to the periods mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- Where you have raised a complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or

• you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further How can I manage the information we hold about you);

## How can I manage the information we hold about you

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request (including any identification documents requested).

You have the right to:

- 1. Ask for a copy of the information that we hold about you;
- 2. Correct and update your information;
- 3. Withdraw your consent (where we rely on it). Please see further How do we use this information;
- 4. Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
- 5. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
- 6. Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

You can exercise the above rights and/or manage your information by contacting us using the details below:

Windale Furnishings Limited Unit 2 Hassall Road Skegness Lincolnshire PE25 3TB Telephone: 01754 610437

If you have any specific data protection concerns or a complaint, you can address it to our Data Protection Team at <u>sales@</u>windalefurnishings.co.uk

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

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

Call:

0303 123 1113

# Email:

casework@ico.org.uk.