

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Charles Grosvenor Ltd (“We”) are committed to protecting and respecting your privacy.

This policy and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the “GDPR”).

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Charles Grosvenor Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: 300-302 Birchfield Road, Redditch, B97 4LZ. For all data matters contact Linda Lunn on 01527 543668.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

To inform individuals of our products, news, events or activities

To provide services and products and the performance of a contract

To purchase products and services in accordance with our business operations

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data – name, title, address and contact details including email address and telephone numbers, debit or credit card information for payment purposes only, plans, photographs and Local Authority and Building Control documents relating to a property in conjunction with an enquiry for a loft conversion, staircase and general building works.

We have obtained your personal data from you via our website, email or direct contact from you by telephone or in person to our loft showroom, offices or exhibition. We may also have obtained your personal data from an advertisement of our products to which you responded.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input type="checkbox"/> Consent of the data subject;	BY WRITTEN CONSENT OR CONSENT ACCEPTANCE THROUGH OUR WEBSITE FOR LEGITIMATE BUSINESS PURPOSES AND OUR LEGAL OBLIGATION
<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	TO PROVIDE SERVICES AND PRODUCTS AND THE PERFORMANCE OF A CONTRACT FOR OUR LEGITIMATE BUSINESS SERVICES
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	TO COMPLY WITH OUR LEGAL OBLIGATIONS FOR TAX AND VAT PURPOSES
<input type="checkbox"/> Processing necessary to protect the vital	TO SECURE OUR IT SYSTEMS ETC AND

interests of a data subject or another person	OUR LEGITIMATE BUSINESS PURPOSES
<input type="checkbox"/> Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	TO COMPLY WITH OUR LEGAL OBLIGATIONS FOR TAX AND VAT AND OTHER HMRC LEGAL REQUIREMENTS AND LOCAL AUTHORITY AND BUILDING CONTROL PURPOSES
<input type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	FOR THE LEGITIMATE BUSINESS PURPOSES FOR THE PURPOSES OF SERVICES AND PRODUCTS

b) Special categories of personal data (article 9 of GDPR)

No Special categories of data are processed

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with your permission obtained by telephone, email or face-to-face. Your personal data will only be shared with a third party to comply with our legal obligations or to ensure the security of our IT systems.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data:-

For general enquiries or quotation purposes – 5 years for legitimate business reasons

For sales and after-sales purposes – 7 years for compliance of HMRC requirements and in case of any legal claims/complaints and for legitimate business reasons to comply with our 5-year guarantee

We retain the personal data of our suppliers and business colleagues for the length of our business relationship

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to provide a quotation and is necessary to enter into a contract.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

All data stored online by Dropbox are encrypted and kept in secure storage servers.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our data representative, Linda Lunn on 01527 543668.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.