

Danesmoor Group Privacy Notice

Introduction

Welcome to the Danesmoor Group Privacy Policy.

Danesmoor Group respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you how we look after your personal data when you visit our website or when you otherwise provide personal data to us via other means (such as over the telephone – regardless of where you contact us from) and tell you about your privacy rights and how the law protects you

The processing of your personal data within the EU and UK is governed by the EU General Data Protection Regulations which is contained within the UK Data Protection Act 2018, (The Act) In essence the term processing means, recording, storage, alteration, destruction sharing, disclosure, basically anything we do with your personal data is deemed to be processing.

This Privacy Notice is a legal requirement however, we at Danesmoor want to assure you that the protection of your personal data is paramount to our business model and ethics. We will ensure our staff respect your data and your privacy and when no longer required we will dispose of your data in a secure manner using recognised industry standard techniques.

Please also refer to the Glossary that we have set out at the end of the policy, if there is any terminology used in this Privacy Notice that you are unfamiliar with or that you don't fully understand, please don't hesitate to contact us.

1. Purpose of this Privacy Policy

It is important that you read this Privacy Notice together with any other version of our Privacy Notice that 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 Notice relates to Danesmoor Group, (and/or any Group Company including, but not limited to PWS Distributors, Life Kitchens for Living, Cookhouse Design York and Danesmoor Agency), a company registered in England and Wales under number 08143416, whose registered office is at **Heighington Lane, Aycliffe Business Park, Newton Aycliffe, England, DL5 6AH**. Danesmoor Group is registered with the Information Commissioner's Office, A8950155.

Contact details

If you have any questions or concerns about this Privacy Statement, or how we handle your personal data, please contact us at:

Danesmoor Group Ltd, **Heighington Lane, Aycliffe Business Park, Newton Aycliffe, England, DL5 6AH**

Or

01325 505555

Or data.protection@danesmooorgroup.co.uk

Changes to this Privacy Policy

Following review, we may update our Privacy Notice from time to time, by communicating such changes to you or publishing the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

Third-party links

This website may include links to third-party websites, plug-ins and applications. 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.

2. The data we collect about you

Personal data means any information about a natural person (“data subject”) from which that person can be identified. It does not include data where your identity has been removed (anonymous data). In some circumstances, we may anonymise your personal data so that it can no longer be associated with you but is processed for research or statistical purposes. In this instance, we may use this information indefinitely without further notice to you.

Data About Children

We do not knowingly process data from children. If you believe that we have unknowingly collected or processed personal data from a child, contact us as soon possible.

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

(A) Identity data

This includes data relating specifically to your identity, such as your given name, surname, or similar identifiers, marital status, title, date of birth and gender.

(B) Contact data

This includes data relating to how you may be contacted, such as your home address, business address, email address and telephone numbers.

(C) Financial data

This includes data relating to your means and methods of payment, such as your bank account and payment card details.

(D) Transaction data

This includes data relating to the transactions you have carried out with us, such as details about payments to and from you and other details of products and services you have purchased from us.

(E) Technical data

This includes more technical data that we may obtain when you make use of our website, such as your internet protocol (IP) address, your log-in 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 this website.

(F) Profile data

This includes the data that we receive if and when you create a profile on our website and make use of that profile, such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

(G) Usage data

This includes information about how you use our website, products and services.

(H) Marketing and communications data

This includes your preferences in relation to whether or not you want to receive marketing from us and also your communication preferences.

3. How your personal data is collected

We use different methods to collect data from and about you including through:

(A) 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 you:

- Enquire about our products or services
- request a quote
- subscribe to our newsletter or other publications
- request marketing
- give us some feedback
- use our online payment and client portals

(B) Automated technologies or interactions

As you interact with our website, we may automatically collect technical data about your software, hardware, browsing actions and patterns including your IP Address.

- We collect this personal data by using cookies, or other similar technologies. Please see our Cookie Policy on our websites for further details.

(C) Third parties

We may receive personal data about you from various third parties, as set out below:

Technical Data from the following parties:

- (i) analytics providers, such as Google, which is based outside the EU

4. How we use your personal data

We have set out below, in a table format, a description of all the ways we will 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.

There may be more than one lawful basis on which we may process your personal data depending on the specific purpose for which we are using your data. Please contact us at data.protection@danemoorgroup.co.uk if you need details about the specific legal basis, we are relying on to process your personal data where more than one basis has been set out in the table below.

We rely on consent for direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at data.protection@danemoorgroup.co.uk.

Purpose/Activity/Type of Data	Lawful basis for processing
Register you as a prospective customer. Type of data: (a) Identity (b) Contact	a) Legitimate interest
Fulfilling orders, supplying a product or service. Manage payments, fees and charges. Collect and recover money owed to us. Type of data: (a) Identity (b) Contact	a) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

(c) Financial	b) Processing is necessary in our legitimate interests
<p>Providing advice and information regarding our products and services</p> <p>Type of data:</p> <p>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications.</p>	<p>a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes.</p> <p>b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>c) Processing is necessary in our legitimate interests</p>
<p>To manage our relationship with you which may include:</p> <p>Manage payments, fees and charges Collect and recover money owed to us</p> <p>Type of data:</p> <p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Financial</p>	<p>(a) Processing is necessary for compliance with a legal obligation to which the controller is subject.</p> <p>(b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>(c) Processing is necessary in our legitimate interests.</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> <p>Type of data:</p> <p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Processing is necessary in our legitimate interests.</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Processing is necessary in our legitimate interests.</p>

<p>Type of data:</p> <p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p> <p>Type of data:</p> <p>(a) Technical (b) Usage</p>	<p>(a) Processing is necessary in our legitimate interests.</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p> <p>Type of data:</p> <p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>(a) Processing is necessary in our legitimate interests.</p>
<p>Potential Employees</p> <p>Type of data</p> <p>(a) Your name and contact information. (b) CV including qualifications, education, previous experience, previous employers and your referees' contact details, as well as anything else you choose to tell us.</p>	<p>(a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes. (b) Processing is necessary in our legitimate interests.</p>

Glossary of terms used in this section.

Legitimate Interest

Means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider

and balance any potential impact on you (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 required or permitted to by law).

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

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

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 services from us and if you have, in each case, you have opted in to receive that marketing.

Third-party marketing

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

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out unsubscribe links on any marketing message sent to you, or by sending an email to data.protection@danemoorgroup.co.uk

Where you opt-out of receiving these marketing messages, this will not apply to personal data that you have provided to us as a result of other services or transactions.

Cookies

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 this website may become inaccessible or not function properly.

Changing why we use your data.

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 the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at data.protection@danesmooorgroup.co.uk.

If we should ever need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above or where this is required or permitted by law.

5. 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 in paragraph 4 above.

(A) Internal third parties

(B) External third parties

6. Third Party Data Processors

In the course of its role as data controller, Danesmoor Group may engage third-party service providers, or data processors, to process personal data on its behalf.

In each case, a written contract is in place with the processor, outlining their obligations in relation to personal data, the security measures that they must have in place to protect the data, the specific purpose, or purposes for which they are engaged, and the understanding that they will only process the data,

- as instructed by Danesmoor Group and
- in compliance with the GDPR and/or relevant data protection law, and
- EU Electronic Communications Directive.

The agreement will also include reference to the fact that as a data controller, Danesmoor Group is entitled, from time to time, to audit or inspect the data management activities of the data processor, and to ensure that they remain compliant with the relevant legislation, and with the terms of the contract. Regular audit trail monitoring will be undertaken by the Danesmoor Group DPO to ensure compliance with this Agreement by any third-party entity, which processes personal data on behalf of Danesmoor Group. In the event of a data security breach affecting the personal data being processed on behalf of Danesmoor Group the relevant third-party processor will notify Danesmoor Group controller without undue delay. Failure of a data processor to manage Danesmoor Group's data in a compliant manner will be viewed as a breach of contract, and may result in legal action, where deemed necessary

7. 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 or if we deem it necessary for the protection of your rights and freedoms.

8. Data retention

The length of time we will retain your personal data will depend on the purpose for which we are processing it. The following criteria will always be applied:

- We will retain personal data for the minimum period required for the purpose(s) of processing.
- Personal data will be retained for a period of time subject to our Retention and Destruction of Personal Data Notice and/or legal requirements.
- When personal data is no longer required to be retained, it will either be anonymized, to remove all personal identifiable information, or deleted in a secure manner in accordance with our technical and organisational procedures, and in line with our Retention and Destruction of Personal Data Policy.

9. Your legal rights

Your right to be informed	We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal information and our use of it. We have written this Notice to do just that, but if you have any questions or require more specific information, you can contact us at data.protection@danemoorgroup.co.uk .
Your right to access your data	You have the right to ask us to confirm whether we process your personal data and, to have access to the personal data, and any additional information, that additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data.

Your right to rectification	You have the right to ask us to rectify information if you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.
Your right to erasure	Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed.
Your right to restrict processing	<p>You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:</p> <ul style="list-style-type: none"> • The accuracy of the personal data is contested. • Processing of the personal data is unlawful. • We no longer need the personal data for processing, but the personal data is required for part of a legal process. • The right to object has been exercised and processing is restricted pending a decision on the status of the processing.
Your right to object to processing	You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure.
Your right to data portability.	You have a legal right to receive a copy of the personal data we hold about you in a structured, commonly used and machine-readable format. the right only applies if we are processing information based on your consent or for the performance of a contract and the processing is automated.

If you wish to exercise any of the rights set out above, please contact us at data.protection@danemoorgroup.co.uk . You have the right to make an enquiry or complaint at any time. There are many data protection supervisory bodies around the world however, we would suggest that you make any complaints to the United Kingdom data protection supervisory body, the Information Commissioner's Office (ICO), ico.org.uk.

However, if we can deal with your concerns directly, please contact us in the first instance.

No charge required for access

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 will 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. Please contact us at data.protection@danemoorgroup.co.uk to determine your nearest location.

Time limit to respond

We will respond to all legitimate requests within one calendar month. It may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within a calendar month of receipt of the request and keep you updated.

10. Glossary

• Data Controller

Means a body or entity which determines the purposes and means of processing activities as well as the practical aspects of the implementation of the personal data and any processing carried out by a data processor.

• Joint Controller

Means the joint participation of two or more entities who, through common decision, determine the purposes and means of processing activities as well as the practical aspects of the implementation of the personal data and any processing carried out by a data processor.

• Data Processor

Means a legal person, body or entity which undertakes the processing of personal data on behalf of the data controller or joint controllers.

• Internal third parties

Other companies in the Danemoor Group acting as Joint Controllers or processors.

• External third parties

i. Service providers acting as processors.

ii. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, information technology service providers and insurers.

iii. HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.