

## Data Protection Policy

### 1. Introduction

This Data Protection Policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here but we want you to be fully informed about your rights, and how Commonfield Services Ltd. uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Data Protection Policy from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

When you are using the Commonfield Services website, Commonfield Services Ltd. is the data controller.

### 2. Explaining the legal basis we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

- Consent

In specific situations, we can collect and process your data with your consent. For example, when you tick a box to receive email newsletters. When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

- Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you order an item from us for home delivery, we'll collect your address details to deliver your purchase, and pass them to our courier.

- Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting Commonfield Services to law enforcement.

- Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history to send you or make available personalised offers.

We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

### 3. When do we collect your personal data?

- When you visit our website.
- When you create an account with us.
- When you purchase a product or service in store or by phone but don't have (or don't use) an account.
- When you contact us by any means with queries, complaints etc.
- When you book any kind of appointment with us or book to attend an event, for example a showroom visit.
- When you choose to complete any surveys, we send you.
- When you comment on or review our products and services. Any individual may access personal data related to them, including opinions. So, if your comment or review includes information about the employee who provided that service, it may be passed on to them if requested.
- When you fill in any forms. For example, if an accident happens in the showroom, an employee may collect your personal data.
- When you've given a third-party permission to share with us the information they hold about you.
- We collect data from publicly available sources (such as Land Registry) when you have given your consent to share information or where the information is made public as a matter of law.

### 4. What sort of personal data do we collect?

- If you make an enquiry or purchase (face-to-face or online): your name, gender, date of birth, billing/delivery address, orders and receipts, email and telephone number.
- Details of your interactions with us through our showroom or online. For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made and when you contact us.
- Copies of documents you provide to prove your age or identity where the law requires this. (including your passport and driver's licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.
- Details of your visits to our website, and which site you came from to ours. Information gathered by the use of cookies in your web browser.

We'll only ask for and use your personal data collected to tailor your experience with us. Of course, it's always your choice whether you share such details with us.

- Payment card information.
- Your comments and product reviews.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

## 5. How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you. We then use this to offer you promotions, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service. Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for. For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.

Here's how we'll use your personal data and why:

- To process any orders that you make. If we don't collect your personal data at this point, we won't be able to process your order and comply with our legal obligations.

*For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.*

- To respond to your queries, refund requests and complaints. Handling the information, you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, telephone and through our contact centres about relevant products and services including tailored special offers, discounts, promotions, events and so on.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you.

*For example, updates to this Data Protection Policy and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.*

- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

- To comply with our contractual or legal obligations to share data with law enforcement.

*For example, when a court order is submitted to share data with law enforcement agencies or a court of law.*

- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time by letting us know.

- Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers or a fitter visiting your home). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request.

## 6. How we protect your personal data

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our website using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information is secured to ensure it is protected.

## 7. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods:

1. Orders
  - a. When you place an order, we'll keep the personal data you give us for five years so we can comply with our legal and contractual obligations.
2. Warranties
  - a. If your order included a warranty, the associated personal data will be kept until the end of the warranty period.

## 8. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties. For example, delivery couriers, technicians visiting your home, for fraud management, to handle complaints, to help us personalise our offers to you and so on.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Direct marketing companies who help us manage our electronic communications with you.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites.
- Data insight companies to ensure your details are up to date and accurate.

Sharing your data with third parties for their own purposes: (we will only do this in very specific circumstances)

For example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.
- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

## 9. What are your rights over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact us to request to exercise these rights at any time as follows:

The Compliance Officer, Unit 1 Lawrence Way, Lawrence Industrial Estate, Dunstable, Bedfordshire LU6 1BD or email [lisa-marie.wynne@commonfield.com](mailto:lisa-marie.wynne@commonfield.com).

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent

- Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

- In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

- You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

- To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Protection Policy.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## 10. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites).