# **Privacy Notice**

At Sovini Trade Supplies we take your privacy and take the protection, confidentiality and security of your personal data very seriously. This Privacy Notice will inform you as to how we look after your personal data that we collect when you make transactions or place orders with us. You will also find information about your privacy rights and how the law protects you.

This notice sets out our commitment to protecting personal data and is designed to comply with the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act with effect from 25<sup>th</sup> May 2018.

# What personal data will we collect about you

We will collect basic contact details for example first name, forename, address, postcode and telephone number. We collect CCTV images to provide security and protect both our visitors and communities. We also collect bank details for payment purposes.

# Lawful Basis for processing your personal information

The lawful bases for which we will process your data are:

We will process under the legitimate interests condition or that of a third-party when carrying out customer transactions and deliveries.

CCTV Images are processed under Schedule 2 Exemptions etc. from the GDPR part 1 adaptions and restrictions based on articles 6(3) and 23(1)

Crime and taxation: general

2(1) the listed GDPR provisions and Article 34(1) and (4) of the GDPR (communication of personal data breach to the data subject) do not apply to personal data processed for any of the following purposes—

the prevention or detection of crime,(b) the apprehension or prosecution of offenders

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below. We have also included a glossary which sets out the meaning of some of the terms used in this Privacy Notice.

1.Who we are and the purpose of this Privacy Notice

2.Changes to the privacy policy and your duty to inform us of changes

3.How is your personal data collected?

4.Our processing of your personal data

5.Disclosures of your personal data

<u>6. CCTV</u>

7.International transfers

8.Data security

9.Data retention

10.Your legal rights

11.Automated decision making

12. Contact details

Who we are and the purpose of this Privacy Notice

This Privacy Notice aims to give you information on how Sovini Trade Supplies collects and processes your personal data.

We obtain your personal data in order to process and deliver orders, this enables us to conduct our normal business operations as a retail supplier of building materials and products to our customers.

Sovini Trade Supplies is a controller and responsible for your personal data (for simplicity throughout this notice "we", "us" or "our" means Sovini Trade Supplies in this privacy Notice).

Sovini Trade Supplies or STS is part of the Sovini Group which is made up of different legal entities, details of which can be found on <u>The Sovini Group website</u>. Back to top

Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review. This version was last updated in January 2019. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Back to top

How is your personal data collected?

The different methods we use to collect data include through face-to-face sales transactions, telephone and online.

# Back to top

If you fail to provide personal data

Where you fail to supply your personal information to us we may not be able to provide some services such as deliveries or updates on pending orders.

## Back to top

## Change of purpose

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 using the detail set out below.

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

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

## Back to top

## Disclosures of your personal data

We do not share your personal information with any third party organisations.

# Back to top

## CCTV

Sovini Trade Supplies has closed circuit television (CCTV) and you may be recorded when you visit them. We use CCTV to provide security and protect both our visitors and communities.

We will only view CCTV when it is necessary to do so, for example to detect or prevent crime. We store the footage for a set period of time after which it is recorded over. We ensure that we comply with the ICO's CCTV Code of Practice and we put up notices so you know when CCTV is used.

## Back to top

## International transfers

We do not transfer your personal data outside the European Economic Area ("EEA").

# 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.

## Back to top

## Data Retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

## Access to your personal information and correction

Under Article 15 of GDPR you have the right to request access to the personal information we may hold about you. If we do hold information about you we will:

- Give you a description of it
- Tell you why we are holding it
- Tell you who it could be disclosed to
- Let you have a copy of the information in an intelligible format

If you have any enquiries relating to Data Protection, retention of documents or require access to your information please contact

dpenquiries@sovini.co.uk or write to: Sovini Ltd Atlantic House Dunnings Bridge Road Bootle, Merseyside L30 4TH

If you have a complaint about our use of your information, we would prefer you to contact us directly in the first instance so that we can address your complaint. However, you can also contact the Information Commissioner's Office via their website at <u>www.ico.org.uk/concerns</u> or write to them at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow, Cheshire SK9 5AF