

Stelrad Privacy Policy

1. OVERVIEW

- 1.1. In this Privacy Policy, references to **we, us or our** (or words of similar import) means Stelrad Management Limited.
- 1.2. In this Privacy Policy, references to **you** mean the person whose personal information (as defined below) we collect, use and process. This includes anyone who contacts us in connection with the products we provide or otherwise interacts with us (for example, via our Website (as defined below)).
- 1.3. In this Privacy Policy, references to **Website** means our website www.stelrad.com.
- 1.4. We are committed to protecting your privacy. We will use your personal information in accordance with the Data Protection Act 1998 (the **DPA**) and other applicable laws and regulations that relate to data protection and privacy.

2. DATA CONTROLLER

- 2.1. For the purposes of the DPA, we are the data controller in respect of your personal information that we collect and process as further described in this Privacy Policy.
- 2.2. As described below, we may share your personal information with other organisations that may receive and process your personal information as a data controller in their own right.

3. THE INFORMATION THAT WE COLLECT

- 3.1. We may collect and process information about you, including your name, address, contact details (including email address and mobile phone number), payment card details, product selections and details of your purchases and purchasing habits. This information is referred to in this Privacy Policy as **personal information**.
- 3.2. In particular, we may collect and process the following personal information about you:
 - 3.2.1. Information that you provide by filling in forms, including those on our Website. This includes information provided by you at the time of becoming a registered user of our Website). This information could include your name, date of birth, address and contact details.
 - 3.2.2. When you place order(s) for goods (on our Website), we collect personal information to process and fulfil your order(s), including your payment card details and delivery address.
 - 3.2.3. Details about the transactions you carry out with us.
 - 3.2.4. Information contained in and records of communications between us, including recordings of telephone calls.
 - 3.2.5. Information about your preferences in connection with our Website, for the purposes of enhancing and personalising your experience on the Website.
 - 3.2.6. Details of your visits to our Website, including, but not limited to, traffic data, location data (including the country and telephone area code where your computer is located) and the resources that you access (including the pages of our Website that you view).
 - 3.2.7. We will also collect information concerning your marketing preferences.

- 3.3. If you provide us with personal information about another person, you must ensure that before you provide us with their personal information, you have their agreement to do so and that they are aware of the ways in which we use personal information as set out in this Privacy Policy.

4. THE WAY WE USE INFORMATION THAT WE COLLECT

- 4.1. We use your personal information in connection with our business activities. In particular, we may use your personal information in the following ways:
- 4.1.1. to carry out our obligations arising from any contracts entered into between you and us; for example, we will use your delivery address to process your order(s);
 - 4.1.2. to manage and administer any other arrangements between you and us;
 - 4.1.3. to communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us;
 - 4.1.4. to carry out market research; for example, we may contact you (including by email) to obtain your feedback on our products, and we may use details of your purchases to understand market trends and to identify popular products; and
 - 4.1.5. to help us review, develop and improve the products we offer; for example, calls to our contact centres may be monitored and/or recorded for quality control and training purposes.
- 4.2. In accordance with your preferences, we may also use your personal information send you marketing communications. We may use your personal information in order to ascertain the marketing communications that are likely to be of particular interest to you. The section below entitled "Your Rights Under Data Protection Law" explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any orders you submit or products you purchase.
- 4.3. Your personal information may also be used by us, our employees, contractors or agents, and disclosed to third parties, in order to comply with any legal obligation (including in connection with a court order), or in order to enforce or apply our website Terms of Use (<https://www.stelrad.com/terms-conditions/>), Terms and Conditions of Sale (https://www.stelrad.com/docs/Terms_and_Conditions.pdf), or other agreements we have with or otherwise concerning you (including agreements between you and us), or to protect our rights, property or safety or those of our customers, employees or other third parties.

5. WITH WHOM WE MAY SHARE YOUR PERSONAL INFORMATION

- 5.1. In connection with the above uses of your personal information, we may share your personal information with third parties as described below.
- 5.2. We may disclose your personal information to third parties, including in the following circumstances:
- 5.2.1. We use third parties to carry out certain activities on our behalf that involve the processing of personal information. For example, we may engage third parties to:
 - (a) fulfil orders and provide customer services;
 - (b) process payments
 - (c) deliver goods;
 - (d) send postal mail and email;
 - (e) provide marketing services;

- (f) maintain and update our databases of customer details (including the removal of repetitive information); and
- (g) carry out statistical analysis and reporting for internal business purposes.

Such third parties will have access to personal information in order to perform their functions. The third parties will not be able to use the information for any other purpose. We may use the information we receive from third parties to supplement, improve and add to our databases of customer details.

- 5.2.2. We may pass personal information to external agencies and organisations (including the police and other law enforcement agencies) for the purpose of preventing and detecting fraud (including fraudulent transactions) and criminal activity. These external agencies may check the information we give them against public and private databases and may keep a record of such checks to use in future security checks. We may also disclose personal information to the police and other law enforcement authorities in connection with the prevention and detection of crime.
- 5.2.3. In the event that we sell or buy any business or assets, we may disclose personal information held by us about our customers to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party (or subject to a reorganisation within our corporate group), personal information held by us about our customers will be one of the transferred assets.
- 5.2.4. We may pass your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation (including in connection with a court order), or in order to enforce or apply our website Terms of Use (<https://www.stelrad.com/terms-conditions/>), Terms and Conditions of Sale (https://www.stelrad.com/docs/Terms_and_Conditions.pdf), or other agreements we have with or otherwise concerning you (including agreements between you and us); or to protect our rights, property, employees or other third parties.

6. WHERE WILL YOUR PERSONAL INFORMATION BE PROCESSED?

- 6.1. In relation to the above uses of your personal information and the above sharing arrangements, your personal information may be transferred to, and stored and processed in, one or more countries outside the European Economic Area (**EEA**), including countries which do not provide equivalent protection for personal information as the DPA. In these circumstances, we will take steps to ensure that your personal information is adequately protected in accordance with the requirements of the DPA.

7. PROTECTING YOUR PERSONAL INFORMATION

- 7.1. The transmission of information via the internet is not completely secure; this risk is common across the internet and not specific to our Website. We cannot guarantee the security of your data (including your personal information) transmitted to our Website; any transmission is at your own risk.
- 7.2. It is important for you to protect against unauthorised access to your computing device. Be sure to sign off and close your browser when you have finished your user session. This will help to ensure that others do not access your personal information if you share your computing device or use a computing device in a public place such as a library or internet café.

8. YOUR RIGHTS UNDER DATA PROTECTION LAW

- 8.1. Under data protection law you have the right to access the personal information that we hold about you. For further information about how to access the information that we hold about you please see clause 9.1. You also have the right to ask us not to process your personal information for marketing purposes. We will usually inform you (before collecting your personal information) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

- 8.2. You can exercise your right to prevent such processing at the point we collect your data. You can also exercise the right at any time by contacting us at Stelrad Management Limited, Stelrad House, Marriot Road, Mexborough, S64 8BN or stelraddirect@stelrad.com.

9. ACCESS TO YOUR PERSONAL INFORMATION

- 9.1. The DPA gives you the right to access your personal information. Your right of access can be exercised in accordance with the DPA. Any access request may be subject to a fee (currently not exceeding £10) to meet our costs in providing you with details of the personal information we hold about you. To request access to your personal information, please contact us using the details below.

10. CONTACTING US

- 10.1. If you have any questions, comments or requests regarding this Privacy Policy, please feel free to contact us in any of the following ways:
- 10.1.1. by e-mail at stelraddirect@stelrad.com.
 - 10.1.2. by telephone on 01709 572 299.
 - 10.1.3. by writing to us at: 69-75 The Side, Newcastle Upon Tyne, Tyne & Wear, NE1 3JE.

11. COOKIES ON THE WEBSITE

- 11.1. 'Cookies' are a type of file stored on your internet device (PC, Phone or Tablet) and used by many websites in various ways enabling you to personalise your online experience. We use cookies to enable our systems to recognise your browser and help us to track visitors to our Website so we can better understand what portions of the Website best serve you.
- 11.2. To find out more about the types of cookies we use on the Website, how we use them and how you can change your cookies settings, please read our Cookies policy (<https://www.stelrad.com/cookie-policy/>).

11.3. LINKS TO OTHER WEBSITES

- 11.4. From time to time we may also establish relationships with third parties that will enable you to access the websites of such third parties directly from our Website. Each third party operates its own policy regarding the processing of personal information and the use of cookies on its website(s) and you are advised to read the privacy policy and cookies policy on the relevant website(s).
- 11.5. Please note that such third party websites are not under our control and we do not contribute to the content of such websites. When you click through to these websites you leave the area controlled by us. We do not accept responsibility or liability for any issues arising in connection with the third party's use of your data (including your personal information), the website content or the services offered to you by these websites.

12. CHANGES TO THIS PRIVACY POLICY

- 12.1. If we decide to change this Privacy Policy, we will post the updated Privacy Policy on our Website so that you are always aware of what personal information we collect, how we use it and under what circumstances we disclose it. The updated Privacy Policy will take effect as soon as it is posted on our Website.
- 12.2. This Policy was last updated in December 2016.