

PRIVACY NOTICE FOR CUSTOMERS

1. INTRODUCTION

1.1 In this Privacy Notice:

1.1.1 references to **we, us** or **our** means Stelrad Limited and Stelrad Management Limited, entities that supply you with products and are identified in the contract we have with you or the Customer.

1.1.2 references to **you** or **your** means any individual who we supply products to (including any prospective customers) or any individual who is otherwise engaged or employed by one of our Customers;

1.1.3 references to **Customer** means any organisation that we supply products to; and

1.1.4 references to the **Website** means all the websites which are operated by Stelrad Limited, which include, www.stelrad.com, www.stelrad.ie & www.henrad.co.uk.

2. PRIVACY NOTICE

2.1 This Privacy Notice (together with the terms of engagement or contract which governs our supply of products) sets out the basis on which we collect and use personal information about you when we supply products to you or our Customer.

2.2 This Privacy Notice describes:

2.2.1 who is responsible for the personal information that we collect about you;

2.2.2 the personal information we collect about you;

2.2.3 how we will use it;

2.2.4 who we may disclose it to; and

2.2.5 your rights and choices in relation to your personal information.

This is to make sure you have a full picture of how we collect and use your personal information.

2.3 In this Privacy Notice where we use the words **personal information** we use these words to describe information that is about you and other individuals (for example, other individuals whose contact details you provide to us) and which identifies you or those individuals.

2.4 You have the right to object to our use of your personal information in certain circumstances. A summary of your right to object (along with other rights under data protection law) and the details of who to contact if you want to exercise them can be found at paragraphs 12 and 14 below.

3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

3.1 We or the relevant Company in our Group from whom you or the Customer orders/buys our product, are the data controller for the purpose of data protection law in respect of your personal information collected and used in connection with the provision of services by us to you or our Customer. This is because we, or the relevant members of our Group as the case may be, dictate the purpose for which your personal information is used and how we use your personal information.

4. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

4.1 We collect and use personal information about you in the course of us providing services to you or our Customer. The personal information we hold includes:

4.1.1 Information that you provide to us / we collect from you

The information that you provide to us / we collect from you may include the following:

Type of Personal Information	Examples
General	
Contact information.	Name, title, address, date of birth, email address, company and telephone number.
Log in details.	Username and account number for access to Website.
Financial	
Financial information and account details.	Bank account number or other financial account number and account details.
Marketing	
Marketing preferences (including details of subscriptions to any newsletters).	Details of any marketing preferences that you express including any opt outs you provide.
Other	
CCTV footage.	Images captured on CCTV if you visit our premises.
Surveys & Questionnaires.	Your views and opinions about our products and customer services directly, by phone, online, by email or by post.
Customer Service Contact Centre	We record all telephone conversations for training and marketing purposes. Except when processing payment details.
Online activity information (to the extent that it constitutes personal information).	<p>Technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system platform.</p> <p>Information about your visit to the Websites, including the full Uniform Resource Locators (URL) clickstream to, through and from the Websites (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.</p>

This information will be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) when you fill in forms for us (including those on the Website);
- (c) via our social media pages on Facebook, Twitter, LinkedIn and Instagram, other social media content, tools and applications; and
- (d) when you provide personal information via our Website or using other systems which we provide to you or the Customer.

4.1.2 Information we receive / collect from other sources

- (a) When we carry out a limited credit check on Customers, we may receive personal information from the provider of these checks such as the names of directors, their addresses and details of previous roles they have held. No credit checks will be undertaken on you individually.
- (b) We may collect personal information from publicly available sources such as Facebook, Twitter, LinkedIn and Instagram, BIID, CIBSE, Glenigans including your name, role and business contact details.

5. WHAT SENSITIVE PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

- 5.1 We do not hold certain sensitive personal information (including any special categories of personal data) about you or our Customers.

6. INFORMATION ABOUT THIRD PARTIES

- 6.1 In the course of us providing services to you or our Customer, you may provide us with personal information relating to third parties. For example, you may provide us with the name and contact details of your emergency contact/next of kin so that we can contact them in an emergency situation.
- 6.2 We will use this personal information in accordance with this Privacy Notice. If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party or are otherwise entitled to share such personal information with us and that you have made the information in this Privacy Notice available to the third party.

7. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

- 7.1 We use your personal information for a variety of different purposes during the course of us providing services to you or our Customer. The main purposes for which we use your personal information are set out below. Under data protection law, we can only use your personal information if we have a legal basis to do so. Examples of where we have a legal basis to process your personal information, includes when:
 - 7.1.1 we have your **consent**;
 - 7.1.2 it is **necessary to enter into or perform a contract** we have with you (or to **take steps at your request prior to entering into that contract**);
 - 7.1.3 it is necessary to comply with a **legal obligation**;
 - 7.1.4 it is necessary in order to **protect your vital interests**; or
 - 7.1.5 it is in our **legitimate interests** to process your personal information.

7.2 We have set out the main reasons for using your personal information in the table below under the heading **Legal Basis**. Where we rely on our legitimate interests, we have set out those interests in the table below.

Purpose	Legal Basis
To communicate with you and other individuals.	<p>Legitimate interests: We require your personal information in order to enable us to supply the services to you or the Customer.</p> <p>Performance of a contract we have with you. This will only be applicable if you are a sole trader who we are providing products [and services] to.</p>
To carry out our obligations arising from any contracts entered into between you and us or in preparation of entering into a contract with you or the Customer.	<p>Legitimate interests: It is in our legitimate interest to comply with the terms of a contract we have in place with a Customer.</p> <p>Performance of a contract we have with you. This will only be applicable if you are a sole trader who we are providing products [and services] to.</p>
To send you direct marketing communications about our products.	<p>Consent: In some circumstances, we may rely on your consent to send direct marketing communications to you.</p>
To manage any service or quality related issues, complaints, feedback and queries in relation to the supply of our products[/services].	<p>Legitimate interests: We require your personal information in order to ensure the products [and services] we supply are fit for purpose.</p> <p>Performance of a contract we have with you. This will only be applicable if you are a sole trader who we are providing products [and services] to.</p>
To analyse the products[/services] we provide to you and improve the quality/performance of our products[/services].	<p>Legitimate interests: We require your personal information in order to improve the products [and services] we provide.</p>
To comply with any legal or regulatory obligations (including in connection with a court order).	<p>Necessary for compliance with a legal obligation to which we are subject.</p>
To carry out credit reference checks on the Customer.	<p>Legitimate interests: We undertake these checks to certify and assess your financial standing to ensure we receive payment for the provision of our products.</p>

7.3 Where we process your personal information on the legal basis of our **legitimate interests** (as set out in the table above), we have carefully considered and assessed your rights and freedoms which require protection of your personal information in respect of each specific purpose. Having undertaken this assessment, we have determined that our legitimate interests are not overridden by your rights under data protection laws. If you would like further information about how we have balanced your rights and freedoms against our legitimate interests, please get in touch using the details at the **How to contact us** section below

7.4 We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or our Customer (as applicable) or in preparation of us entering into a contract with you or our Customer (as applicable). If you do not

provide the relevant personal information to us, we may not be able to perform our obligations pursuant to your contract with us.

8. WHO MAY WE DISCLOSE YOUR PERSONAL INFORMATION TO?

8.1 We may share your personal information with:

8.1.1 our business partners, service providers and sub-contractors for the performance of any contract we enter into with you (for example, our IT providers, marketing service providers, security service providers, insurance providers and document storage providers);

8.1.2 our professional advisors (including accountants, lawyers and auditors) that assist us in carrying out our business activities; and

8.2 For a full list of the third parties with whom your particular personal information may be shared, please contact us using the details at paragraph 14 below.

8.3 We will also disclose your personal information to other third parties, for example:

8.3.1 in the event that we sell or buy any business or assets, we will disclose your personal information to the prospective seller or buyer of such business or assets;

8.3.2 if we or substantially all of our assets are acquired by a third party, personal information held by us will be one of the transferred assets; and

8.3.3 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

9. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

9.1 We process your personal information nationally for the purposes set out above and do not intend to transfer any data outside of the European Economic Area (EEA).

9.2 This approach is compliant with applicable data protection law (being Articles 45 or 46.2 of the General Data Protection Regulation).

10. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION

10.1 We will retain your personal information for no longer than is necessary for the purposes for which the personal information are processed. The length of time we hold on to your personal information will vary according to what that information is and the reason for which it is being processed.

10.2 For further information about how long we keep your personal information, please contact us using the details at paragraph 14 below.

11. DATA SECURITY

11.1 We have put in place appropriate security measures to guard against your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For further information about these measures, please contact us using the details at paragraph 14 below.

11.2 We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

12. YOUR RIGHTS

You have certain rights with respect to your personal information. The rights will only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. Details of who to contact to exercise these rights can be found in paragraph 14.

Summary of your rights	
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you and information about how we use it, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information	<p>You have the right to ask that your personal information be deleted in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where your personal information is no longer necessary in relation to the purposes for which it was collected or otherwise used; • if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; • if you object to the use of your personal information (as set out below); • if we have used your personal information unlawfully; or • if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	<p>You have the right to suspend our use of your personal information in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where you think your personal information is inaccurate but only for so long as is required for us to verify the accuracy of your personal information; • the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; • we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or • you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	<p>You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.</p> <p>The right only applies:</p> <ul style="list-style-type: none"> • to personal information you provided to us; • where we rely on the following legal bases: <ul style="list-style-type: none"> • consent; or • for the performance of a contract; and

Summary of your rights	
	<ul style="list-style-type: none"> when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	<p>You have the right to object to the use of your personal information in certain circumstances and subject to certain exemptions. For example:</p> <ul style="list-style-type: none"> where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); if you object to the use of your personal information for direct marketing purposes; and where we use your personal information to take a decision which is based solely on automated processing where that decision produces a legal effect or otherwise significantly affects you.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	If you think that we have processed your personal information in a manner that is not in accordance with data protection law, you can make a complaint to the relevant data protection regulator. In the UK this is the Information Commissioner's Office (ICO) and they can be contacted on 0303 123 1113 or please see www.ico.org.uk . If you live or work in an EEA member state, you may complain to the regulator in that state.

13. CHANGES TO OUR PRIVACY NOTICE

Any changes we make to this Privacy Notice in the future will be posted on this page and, where appropriate, we will give you reasonable notice of any changes.

14. QUERIES

14.1 If you have any questions regarding this Privacy Notice or the way we use your personal information, please contact our Data Protection Owner by:

14.1.1 email at HR@stelrad.com; or

14.1.2 post at Stelrad Limited, Stelrad House, Marriott Road, Mexborough, South Yorkshire S64 8BN.

This Privacy Notice was last updated in [INSERT DATE] 2018.