PRIVACY NOTICE

Coastal Windows and Conservatories (UK) Ltd

Prepared by – Data Privacy Advisory Service

October 2024

1. WHO WE ARE?

Coastal Windows and Conservatories (UK) Ltd ("Coastal") are a limited company registered in England and Wales under registration number **03973690** with a registered office at **Unit 8 Silverhills Building, Silverhills Road, Decoy, Industrial E, Newton Abbot, Devon, TQ12 5LZ** Coastal are the 'Controller' of any personal information we collect about you.

We must process personal data (this may at times also include sensitive personal data) so that it can provide our services or offer employment. In doing so, we act as a data controller of your personal data and we are responsible for determining how information relating to you is used, stored, and shared.

We will process your personal information in accordance with all applicable laws, including the UK and EU General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA 2018).

This notice does not form part of any agreement or contract and may be updated at any time.

2. WHAT IS PERSONAL DATA?

Personal data means any information relating to you that identifies you, or through which you can be identified, directly or indirectly. In particular, by reference to an identifier such as a name, an identification number, location data, or an online identifier or to one or more factors specific to you physical, physiological, genetic, mental, economic, cultural or social identity.

3. THE PURPOSE OF THIS PRIVACY NOTICE

The purpose of this Privacy Notice is to let you know how we process your Personal Data when you engage with our services or visit our website. This Privacy Notice therefore explains what Personal Data we collect from you and how we collect, use, store and disclose it. This Privacy Notice also contains information about your rights under applicable data protection legislation.

We are committed to compliance with the applicable data protection legislation. We believe that ensuring data protection compliance is the foundation of trustworthy relationships.

It is important that you read this Privacy Notice together with any other Privacy Notice we 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 supplements the other notices and is not intended to override them.

4. WHAT DATA DO WE COLLECT?

1. Your full name
2. Your full business address and/or home address.
3. Telephone number/s, including business landline, home landline and mobile numbers.
4. Email address (where applicable)
5. As part of our aim to raise standards, we may record and monitor communication with you such as phone conversations, emails and texts. Purely for training, legal, compliance and quality reliance purposes.

Information needed to supply services and/or products to you include:

1. Information when opening an 'account' includes, payment details, details of your order, any past order/service history, address for product delivery, any requirements and/or restrictions and information regarding tax.

2. Customer service information, customer relationship status and marketing information.
3. If you contact us via our social media platforms regarding a product or service, we may collect your profile information and any information left on messages or comments that relate to our business.

Sensitive Personal Data

There may be instances where it is necessary for you to share information with us containing special categories of personal information or 'sensitive personal data'. This relates to things such as details of medical conditions which you may need to share with us so we are able to meet your specific requirements when providing our goods and services.
Due to the sensitive nature of this information, we will only take it from you if you have given us your explicit consent and it is necessary for us to do so. We will also inform you of what we will do with this information and who we will share it with.

We may also automatically collect information when you visit our website such as:

1. Information about your visit such as the URL.
2. Date and time of visit
3. Length of time spent on certain pages and interactive information such as scrolling and clicks.
4. Methods used to browse away from the page such as links.
5. Traffic data
6. Location data
7. Any data provided when requesting further advice or services such as through our enquiry service.
8. Your age
9. Your user name
10. IP address used to connect your device to the internet, domain, country, browser type, operating system and/or platform.
11. If a user of a mobile application, your location data so that we can locate the most relevant products and services.

5. HOW WE USE THIS INFORMATION

1. To process orders you have placed for goods and/or services
2. To provide you with our goods/services
3. To help us improve our products and/or services
4. To allow our agents and/or sales representatives to follow up our service in the form of either telephone, email, post or after care procedure.
5. To ease our internal record storage.
6. To prepare for before and/or after photographs of improvements to your property via our services- for marketing purposes.
7. To enable you to participate in promotions.
8. To prevent/detect fraudulent activity.
9. To review your interactions with us online such as website or messenger, for market research.
10. To create statistical information about our users and agents/employees.
11. To create statistical information in order to improve our products and/or services.
12. To improve our website/browsing experience.
13. To allow us to contact you about special offers, new products or information we believe you may find interesting
14. To help us understand your needs- allowing us to provide a better service.

15. To allow us to contact you for market research purposes.
16. To allow us to contact you about certain communications i.e. changes to our guarantees or terms and conditions.
17. For health and safety and quality reassurance
18. To offer relevant goods and/or services to you or your employer.
19. To deal with any issues or complaints.
20. To implement any business administration ensuring the security of our business, research and development.
21. To comply with any laws, procedures or regulations that apply to us.
22. To establish, exercise or defend our personal rights.

Sensitive personal data, also referred to as Special Category Personal Data, which is defined as data that needs more protection due to its sensitive nature. Additional obligations are placed on the Data Controller and/or Processor for them to process Special Category Personal Data lawfully, which comes under Article 9 of the UK GDPR.

We will only use your Personal Data for the purpose we collected it and in accordance with the law. We will not use your Personal Data for any other purpose without your prior consent. The only exception to this is if it is required or permitted by law, such as where it is necessary for the prevention, investigation, detection or prosecution of criminal offences or the enforcement of civil law matters.

6. HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect personal information relating to you directly from you, this can be when:

- You are enquiring about our services/products via an inbound enquiry such as our website form
- You are purchasing goods/services from us
- When we contact you such as via canvassing and leaflet dropping. We will never contact you via phone or email without prior consent.
- You are applying for a job with us

7. OUR LEGAL BASES FOR PROCESSING YOUR DATA

The UK GDPR, requires that a Controller must have a legal basis for processing Personal Data. These may be:

(a) Your consent. We will obtain you consent directly from you, and you are able to withdraw your consent at any time. You can do this by contacting customerservice@coastal-windows.co.uk
(b) We have a contractual obligation.
(c) We have a legal obligation.
(d) We have a vital interest.
(e) We have a legitimate interest.

In some cases, we may process special category data. This is afforded some extra protection due to its sensitive nature, and therefore, under UK and EU GDPR we are required to provide a lawful basis for processing, and a secondary condition under Article 9. More details can be found within our Record of Processing Activities, but the conditions we may rely on are:

(a) Explicit consent
(b) Employment, social security and social protection (if authorised by law)

(c) Vital interests
(d) Not-for-profit bodies
(e) Made public by the data subject
(f) Legal claims or judicial acts
(g) Reasons of substantial public interest (with a basis in law)
(h) Health or social care (with a basis in law)
(i) Public health (with a basis in law)
(j) Archiving, research and statistics (with a basis in law).

8. WHO HAS ACCESS TO YOUR DATA

We may share your personal information with third parties where required by law, where it is necessary to administer the contract, we have entered into with you.

Recipients of your data may include third-party service providers, other related business entities, a regulator, or to otherwise comply with the law.

If you choose to fund your purchase with us using one of the finance products we offer to our customers as a credit broker on behalf of lenders, we will share your data with the relevant lender, so they are able to process your finance application.

9. MARKETING

With your consent we may contact you via email and/or phone to promote or inform you about our services. If you have provided consent, we may also contact you to promote services provided by third parties. Where we are legally required to obtain your consent to provide you with marketing materials, we will only provide you with such marketing materials if you have provided consent for us to do so.

Where we contact you for direct marketing purposes, we will comply with the requirements set out in the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR).

You will always have full control of your marketing preferences. If you do not wish to continue receiving marketing information from us at any time you can unsubscribe or 'opt-out' by contacting us at customerservice@coastal-windows.co.uk

10. HOW LONG WE WILL KEEP YOUR PERSONAL DATA

We will only keep your Personal Data for as long as is necessary to fulfil the purposes we collected it for, which may include satisfying any legal, accounting, or reporting requirements. The retention period depends on the type of Personal Data and the reason we are processing it.

When calculating the appropriate retention period for your data, we consider the nature and sensitivity of the data, the purposes for which we are processing the data, and any applicable statutory retention periods. Using these criteria, we regularly review the Personal Data which we hold and the purposes for which it is held and processed.

When we determine that Personal Data can no longer be retained (or where we must comply you request us to delete your data in accordance with your right to do so) we ensure that this data is securely deleted or destroyed.

Some data may be used for statistics; however, this data is made anonymous.

11. SECURITY OF YOUR PERSONAL DATA

In order to protect your Personal Data, we put in place appropriate organisational and technical security measures. These measures include ensuring our internal IT systems are suitably secure and implementing procedures to deal with any suspected data breach.

In the unlikely event of a data breach, we will take steps to mitigate any loss or destruction of data and, if required, will notify you and any applicable authority of such a breach.

We often undertake information audit and user testing to ensure all yours and ours data is secure, not duplicated and effective.

Although we use appropriate security measures once we have received your Personal Data, you will appreciate that the transmission of data over the internet (including by email) is never completely secure. We endeavour to protect Personal Data, but we cannot guarantee the security of data transmitted to or by us.

12. TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE EEA

To provide our services, we may need to share your Personal Data with third parties and suppliers outside the European Economic Area (the "**EEA**"). If we do this, we will ensure your Personal Data receives the same protection as if it were being processed inside the EEA. For example, our contracts with our suppliers stipulate the standards they must follow to process Personal Data.

Your data may be transferred to one or more of the following third countries:

We currently implement the following safeguards to protect your personal data:

- Encrypting data when in transit.
- Implementing standard contractual clauses (SCCs), as approved by the European Commission.

13. YOUR RIGHTS

You have rights under the data protection legislation and, subject to certain legal exemptions, we must comply when you inform us that you wish to exercise these rights. There is no charge, unless your requests are manifestly unfounded or excessive. In such circumstances, we may make a reasonable charge or decline to act on your request. Before we action your request, we may ask you for proof of your identity. Once in receipt of this, we will process the request without undue delay and within one calendar month. In order to exercise your rights please contact customerservice@coastal-windows.co.uk

You can contact us if you wish to complain about how we collect, store and use your Personal Data. It is our goal to provide the best possible remedy with regard to your complaints.

However, if you are not satisfied with our answer, you can also contact the relevant competent supervisory authority. In the UK, the relevant supervisory authority is the ICO, contact details of which can be found below.

Your rights in connection with personal information are set out below:

Subject Access Request - You have a right to receive a copy of all the Personal Data we hold about you.

Rectification - If any of the Personal Data we hold about you is incomplete or inaccurate, you have a right to have it corrected.

Erasure - This is also known as the “right to be forgotten”. You have a right to ask us to delete your Personal Data where there is no good reason for us continuing to process it. However, certain criteria apply and if we have a legitimate reason to continue processing your personal data, we will not be legally required to delete it.

Objection - You have a right to object where we are relying on legitimate interests as our legal basis for processing your Personal Data but, in certain circumstances we may be able to continue with the processing. For example, if we have compelling legitimate grounds which override your interests, rights and freedoms or your personal information is needed for the establishment, exercise or defence of legal claims. However, you have an absolute right to object to us processing your Personal Data for direct marketing purposes.

Restriction - You have a right to ask us to restrict the processing of your Personal Data in certain circumstances. For example, you may require us to suspend processing information about you whilst checks are made to ensure it is accurate.

Portability - You have the right to ask us to transfer any Personal Data you have provided to us to another party, subject to certain criteria being satisfied. We will provide this Personal Data in a structured, commonly used and machine-readable format.

Right to withdraw consent - If you have given us your consent for the processing of your Personal Data, you can withdraw this at any time. Please note, the withdrawal has no effect on the legality of the data processing carried out in the past on the basis of your consent. To exercise your right to withdraw consent contact us at customerservice@coastal-windows.co.uk

Right to complain - If you are unhappy with the way in which your personal information has been or is being processed, you have the right to make a complaint about it to the Information Commissioner’s Office (ICO). They can be contacted at:

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

www.ico.org.uk

14. YOUR OBLIGATIONS

If any of your Personal Data changes whilst you are a user of our services, it is important that you update the information within your account to ensure that the data we hold about you is accurate and up to date.

15. THE DATA PROTECTION PRINCIPLES

We will comply with the UK GDPR and the DPA 2018. Article 5 of the UK GDPR contains the data protection principles, which require that Personal Data shall be:

- Processed lawfully, fairly and in a transparent way.
- Collected for specified, explicit and legitimate purposes and not used in any way that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and, where necessary, kept up to date.

- Kept for no longer than is necessary for the purposes we have told you about.
- Kept securely.

We operate according to the principles of the UK GDPR, and PECR, regardless of the location of the data subject.

16. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this Privacy Notice from time to time. Updates to this Privacy Notice will be published on our website. To ensure you are aware of when we make changes to this Privacy Notice, we will amend the revision date at the top of this page. Changes apply as soon as they are published on our website. We therefore recommend that you visit this page regularly to find out about any updates that may have been made.

17. NOTICE REVIEW

This notice will be regularly reviewed and updated as and when necessary to reflect best practices and changes in legislation.

DOCUMENT HISTORY AND VERSION CONTROL

Version No.	Author	Effective Date	Status/Comments
1.0	Data Privacy Advisory Service	October 2024	

REVIEW AND APPROVAL

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

Reviewer	Job Title	Signed Off Date	Status/Comments

Next Review Date
All policies should be reviewed at least annually or when significant change occurs to the policy subject matter. The next review date for this policy is October 2025.