

Sheffield Window Centre's Privacy Policy

When you contact us or visit our website(s), you trust us with your information. This Privacy Policy is meant to help you to understand what information we collect, why we collect it and what we do with it. It is important, a bit long, but we hope you will take the time to read it carefully.

This privacy policy explains:

- What information we collect and why we collect it
- How we use that information
- The choices you have and your rights, including how to access and update information

Changes to data protection law

The law in relation to data protection changed on the 25th May 2018 when the General Data Protection Regulation came into effect in the UK and the EU.

There may be small changes required to this privacy policy in the future, and these will be clearly marked in this document as they are made.

1. Who we are and how you can contact us

When you are using our website, Sheffield Window Centre Ltd is the data controller (referred to as "Sheffield Window Centre", "we", "us" or "our" in this privacy notice). Our registered office is at 60/70 Broad Lane, Sheffield, S1 4BT.

We have appointed a data protection officer ("DPO") who is responsible for overseeing questions in relation to this privacy policy. If you have any questions in relation to this Privacy Policy, including any requests to exercise your rights, please contact the DPO at dpo@sheffield-window-centre.co.uk. If you want to, you can write to the DPO at 60/70 Broad Lane, Sheffield, S1 4BT.

When we refer to our website(s), we mean our website(s) at www.sheffield-window-centre.co.uk

2. Where we collect your personal information from

We may collect, store and transfer personal information about you in the following ways

Data you give to us:

- When you register to use our services;
- When you talk to us on the phone;
- When you use our website;
- When you email or send letters to us for any reason;
- When you engage with us on social media, your social media username, if you interact with us through those channels;
- If you take part in any competitions or promotions we run;
- When you give us feedback, comments and product reviews;
- When you book any kind of appointment with us; and
- When you send us photographs and images of yourself

Data we collect when you use our services

Profile and usage data, including data we gather from the devices you use to connect to those services such as computers and mobile phones, using cookies (please see our separate cookies policy)

- We use several products to analyse traffic to this website and to understand our visitors' needs and to continually improve our site for them. We collect only anonymous, aggregate statistics. For example, we do not tie a specific visit to a specific IP address;
- Sheffield Window Centre and our partners use technologies to collect and store information about the device or browser you use when you visit ours and third party sites, and this may include using cookies or similar technologies to identify your browser or device;
- When you visit our showrooms in Nether Green and Rockingham Street or our head office on Broad Street, we have CCTV systems in operation for the security of both customers and staff. These systems may record your image during your visit;
- When you give us some feedback; and
- When you use our website and subscribe to our newsletter or register to take part in any campaign or competition

Data from third parties we work with

- Companies that introduce you to us
- Social networks
- Agents/agencies working on our behalf
- Government and law enforcement agencies
- Identity and contact data from publicly available sources

3. Data we collect about you

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows.

Identity data – name, username, marital status, title, photographs, date of birth and gender

Contact data – billing address, delivery address, email address or telephone number, social media addresses

Technical data – internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the device you use to access our website.

Profile data – feedback and survey responses.

Usage data – information about how you use our website.

Marketing and communications data – your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any special categories or personal information about you. This includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

If you are using our website to apply for a job with us, our separate candidate policy will apply.

4. How we use your personal information

We are only allowed to use personal information about you if the law allows us to. We have set out in the table below the personal information which we collect from you, how we use it, and the legal basis on which we rely when we use the personal information.

Most commonly, we will use your personal data/personal information in the following circumstances:

- When we need to perform the contract we are about to enter into or have entered into with you (for example, where we have agreed to fit new windows we will collect details of the address where they are to be fitted and pass them on to our fitters).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (for example, we will use your email address to send you information about a product you have shown a particular interest in and would like to know more details about).
- Where we need to comply with a legal or regulatory obligation (for example, we pass on details of people involved in fraud or other criminal activity affecting us to law enforcement agencies).
- Where we can collect and process your data with your consent (for example, when you tick a box to receive our email newsletters).

Purpose and activity	Type of data	Our lawful basis for processing including our legitimate interests (if applicable)
<p>Details of interactions with us through email, letter, telephone, social media or popping into our showrooms. Including sending you relevant, personalised communications by post in relation to updates, offers, services and products. For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you have made and how and when you contact us</p>	<p>Full name, address, email address and copies of your communication with us</p>	<p>We do this on the basis of our contractual obligations to you and our legitimate interests in providing you with the best service and understanding how we can improve our service, products and business based on your experience.</p> <p>We also use this information to protect our business from fraud and other illegal activities.</p>

<p>Handling the information you send enables us to respond.</p> <p>We may also keep a record of these to information any future communication with us and to demonstrate how we communicated with you throughout.</p>		
<p>CCTV at our showrooms and head office</p>	<p>Images of you</p>	<p>We do this on the basis of our legitimate business interests and legal obligation to comply with applicable laws and regulations.</p> <p>If we discover any criminal activity or alleged criminal activity through our use of CCTV, we will process this data for the purposes of preventing or detecting wrongful and unlawful acts.</p> <p>We aim to protect our visitors and customers, as well as our employees, premises and assets.</p>
<p>Newsletters and mailings to keep you informed about relevant products and services including tailored special offers, promotions, events, competitions and so on.</p>	<p>Full name, address, email address and date of birth. Date of birth may be collected to ensure we are not contacting anyone under the age of 16, email address and name are required so that we can send you our newsletter.</p>	<p>This will be subject to your prior consent. If we not have this information then we will not be able to contact you. You can, of course, let us know at any time when you do not want to receive this information.</p>
<p>Managing our relationship with you, including notifying you about changes to our terms or privacy notices</p>	<p>Full name, address, email address.</p>	<p>In this instance we would 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 information for this purpose, we would be unable to comply with our legal obligations.</p>

<p>If partaking in campaigns and competitions</p>	<p>Full name, address, email address and date of birth. Usage, technical and marketing data.</p>	<p>This is necessary for legitimate business interest and where appropriate we will also obtain consent.</p> <p>For competitions, we require this information to notify winners and send on any prize(s) as appropriate.</p> <p>Where you have given specific consent, you may at any time remove that consent.</p>
<p>To send you survey and feedback requests to help improve our services.</p>	<p>Name, address, email address, usage data and marketing data.</p>	<p>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 and services more relevant to you.</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>Identity, contact and technical data.</p>	<p>This is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).</p> <p>It is also necessary to comply with our legal obligations.</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.</p>	<p>Technical and usage data</p>	<p>This is necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>

To make suggestions and recommendations to you about goods or services that may be of interest to you.	Name, address, email address, technical, usage and profile data.	This is necessary for our legitimate interests (to develop our products/services and grow our business).
Applying to a vacancy on our website	Name, address, email address and other information on your curriculum vitae	We will obtain your appropriate consent. Please refer to our separate candidate Privacy Policy.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, see our separate Cookie Policy.

Opting out

You can ask us or third parties to stop sending your marketing messages at any time by contacting us at dpo@sheffield-window-centre.co.uk or writing to our DPO at 60/70 Broad Lane, Sheffield, S1 4BT.

Change of purpose

We will only use your personal information 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 at dpo@sheffield-window-centre.co.uk or writing to our DPO at 60/70 Broad Lane, Sheffield, S1 4BT.

If we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Who we share your personal information with

We may have to share your personal information with the parties set out below for the purposes set out in the table in paragraph 4 above.

- IT companies who support our website and other business systems based in the UK or EEA.
- Organisations that help us manage enquiries and responses to you via email and that are based in the USA but we have adequate measures in place where they will not be storing information outside the EEA (see section 8 below).
- Operational companies such as delivery couriers based in the United Kingdom or EEA.
- Direct marketing companies who help us manage our communications with you in the United Kingdom and EEA.
- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom or EEA who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

We may seek to acquire other businesses or merge with them. If a change happens in our business, then the new owners may use your personal data in the same way set out by this privacy notice.

6. Failing to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

7. Third party links

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those communications may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

8. Transferring your personal information outside the EEA.

The EEA is the European Economic Area, which consists of the EU member states, Iceland, Liechtenstein and Norway.

We do not transfer your data outside of the EEA. However, we may use third party service providers that do, in which case, if they do transfer your personal information outside the EEA, we will make sure that it is protected the same way as if it was being used in the EEA and will ensure adequate safeguarding measures are in place.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information outside the EEA.

9. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator (including the ICO) of a breach where we are legally required to do so.

10. How long do we keep your personal information for?

We will only retain your personal information for as long as is necessary to fulfil the purpose for which it was collected; including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use

or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11. Marketing

We may use your personal information to tell you about relevant goods or services and any upcoming offers.

We can only use your personal information to send you marketing messages if we have either your consent or a legitimate interest to do so.

You can ask us to stop sending you marketing messages at any time – you just need to contact us at dpo@sheffield-window-centre.co.uk or use the opt-out links on any marketing message sent to you.

Where you opt out of receiving marketing messages, this will not apply to personal information provided to us as a result of purchasing our goods or services or any other transaction between you and us.

12. Children

This website is not intended for children under the age of 16 and we do not knowingly collect data relating to children. We encourage parents and legal guardians to monitor their child's internet use. If you have reason to believe a child under the age of 16 has provided personal information to us through our service, please contact dpo@sheffield-window-centre.co.uk or you can write to the DPO at 60/70 Broad Lane, Sheffield, S1 4BT.

13. Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information. Information about your rights are as follows:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want

to object to the processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly-used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. Please contact us as DPO@sheffield-window-centre.co.uk if you want to withdraw your consent, or write to the DPO at 60/70 Broad Lane, Sheffield, S1 4BT.

No fee usually required

You will not have to pay a fee to access your personal information (or exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. Making a complaint

Please let us know if you are unhappy with how we have used your personal information by contacting us at dpo@sheffield-window-centre.co.uk or you can write to the DPO at 60/70 Broad Lane, Sheffield, S1 4BT.

You also have a right to complain to the Information Commissioner's Office. You can find their contact details at www.ico.org.uk. We would be grateful for the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.