

26<sup>th</sup> November 2020

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## PRIVACY POLICY

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We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share the personal information of our customers in the UK and Ireland. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

## Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Schueco UK Limited a company registered in England and Wales with Company Number 07048715 whose registered office is at Whitehall Avenue, Kingston, Milton Keynes MK10 0AL and our group companies
Our data protection officer	Len Kirk mkinfobox@schueco.com
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership  Genetic and biometric data  Data concerning health or disability, sex life or sexual orientation

## Personal information we collect about you

We may collect and use the following personal information about you:

- your name and contact information, including email address and telephone number and company details
- Information to enable us to check and verify your identity, e.g. your date of birth
- your gender information, if you choose to give this to us
- location data, if you choose to give this to us
- your billing information, transaction and payment card information
- your personal or professional interests

- your contact history, purchase history and saved items
- Information about how you use our website, IT, communication systems including Agendize and Userlike
- your responses to surveys, competitions and promotions

This personal information is required to provide products and services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing products or services to you.

### How your personal information is collected

We collect most of this personal information directly from you—in person, by email or via our website. However, we may also collect information:

- from a third party with your consent, e.g. your bank or building society
- from cookies on our website
- via our IT systems, e.g.:
  - our online booking system Agendize;
  - door entry systems and reception logs;
  - automated monitoring of our websites and other technical systems, such as our computer networks and connections; and
  - email and instant messaging systems including Userlike;

### How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for</b>	<b>Our reasons</b>
To provide products and services to you	For the performance of our contract with you or to take steps at your request before entering into a contract

What we use your personal information for	Our reasons
We may save the information you provide through our Agendize online booking system in order to comply with Government advice relating to contact tracing due to Covid-19	To comply with our legal and regulatory obligations
To prevent and detect fraud against you.	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you
Ensuring business policies are adhered to, e.g. policies covering security and internet use.	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
We may save the conversation script from Userlike to ensure the advice we have provided you with is correct and we can refer to it in the event that a claim is made.	For our legitimate interests or those of a third party to make sure we are following our own internal procedures so we can deliver the best service to you.  To comply with our legal and regulatory obligations.
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information  To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you

What we use your personal information for	Our reasons
	To comply with our legal and regulatory obligations
Updating and enhancing customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> <li>—existing and former customers;</li> <li>—third parties who have previously expressed an interest in our services;</li> <li>—third parties with whom we have had no previous dealings.</li> </ul>	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers
External audits and quality checks, e.g. for the audit of our accounts	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

The above table does not apply to special category personal information, such as information relating to health or disability, which we will only request to ensure we can accommodate for

you in the event you have mobility concerns or require assistance with access when visiting our showrooms and only process with your explicit consent.

## **Promotional communications**

We may use your personal information to send you our newsletter or updates (by email or post) about our products, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations outside the Schüco group for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at [mkinfobox@schueco.com](mailto:mkinfobox@schueco.com); or
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

## **Who we share your personal information with**

We routinely share personal information with:

- other companies within the Schüco group
- third parties we use to help deliver our products to you, e.g. payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our business, e.g. marketing agencies, website hosts, Userlike hosts and Agendize hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers; and
- our bank.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g. in relation to the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be

anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

### **Where your personal information is held**

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the UK and EEA'**.

### **How long your personal information will be kept**

We will keep your personal information while you have an account with us or we are providing products or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will retain the information provided through Agendize for three months.

We will retain the conversation scripts from Userlike chats for 12 months.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

### **Transferring your personal information out of the UK and EEA**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the UK and/or European Economic Area (EEA), e.g.:

- with your and our service providers located outside the UK/EEA;
- if you are based outside the UK/EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law. This means we can only transfer your personal information to a country or international organisation outside the UK/EEA where:

- the European Commission has issued an 'adequacy decision' in relation to that country or international organisation; or
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law

These are explained below.

## **European Commission adequacy decision**

The European Commission has the power to determine whether a country or international organisation provides an adequate level of protection for personal information and, if it does, to issue an 'adequacy decision'. The effect of such a decision is that personal information can flow from the UK/EEA to that country without any further safeguards being necessary.

It can take several years for the European Commission to issue an adequacy decision and only a small number of countries currently benefit from one.

Other countries we are likely to transfer personal information to do may not have the benefit of an adequacy decision we are likely to transfer personal information. This does not necessarily mean they provide inadequate protection for personal information, but we must look at alternative grounds for transferring the personal information, such as implementing safeguards or relying on an exception, as explained below.

## **Transfers with appropriate safeguards**

We may transfer your data to a third country on this ground where we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using standard data protection contract clauses approved by the European Commission.

## **Transfers under an exception**

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal information to a third country or international organisation where an exception applies under relevant data protection law, e.g.:

- you have explicitly consented to the proposed transfer after having been informed of the possible risks;
- the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
- the transfer is necessary for a contract in your interests, between us and another person; or
- the transfer is necessary to establish, exercise or defend legal claims

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal information on this ground.

## Further information

If you would like further information about data transferred outside the UK or EEA, please contact our Data Protection Officer (see 'How to contact us' below).

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  —at any time to your personal information being processed for direct marketing (including profiling);  —in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to our Data Protection Officer—see below: **'How to contact us'**; and
- let us have enough information to identify you e.g. your full name, address and order number;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

### **Keeping your personal information secure**

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

### **How to complain**

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

### **Changes to this privacy policy**

This privacy notice was published on 26 November 2020 and last updated on 26 November 2020.

We may change this privacy notice from time to time—when we do we will inform you via our website.

## How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our Data Protection Officer	Len Kirk
Contact address	Schueco (UK) Limited Whitehall Avenue Kingston Milton Keynes MK10 0AL
Email address	<a href="mailto:mkinfobox@schueco.com">mkinfobox@schueco.com</a>
Contact telephone number	01908 282111