

# Privacy Policy

Surface Protection Coatings are committed to protecting your privacy and we comply with data protection laws applicable to the United Kingdom.

This privacy policy applies to personal information about:

- Visitors to our website
- Customers who purchase goods or services or create an account with us
- Our suppliers

## What is personal information?

Personal information is any information relating to an individual who can be identified directly or indirectly, often by name, account number, location, an online identifier or other factors specific to their identity.

Personal information may include “special category data” relating to racial or ethnic origin, political opinions, religious beliefs, membership of a trade union, physical or mental health and criminal records and allegations.

As a rule, we do not collect “special category data” about visitors to our website or our customers or suppliers. The exception is where we identify suspected criminal activity such as fraudulent claims or the use of stolen payment card details. In this case we will record details of the suspected criminal activity and may take appropriate action, including refusing to accept orders, make payments or give refunds. We may also report the incident to the relevant bank or payment card issuer or to the police or other appropriate authorities.

See below for details of how we may use your personal information.

## **Website Visitors: The personal information we collect about you and how we use it**

You can visit and browse our website without providing your name or contact details.

Like many websites, our server logs capture details of your operating system, browser software, IP (Internet Protocol) address and Uniform Resource Locator (URL), including the date and time of your visit.

We use cookies to analyse how our site is used by visitors and to provide some of the functionality

You may choose to provide your contact details (name, address, business, job title, email address, telephone number) if you do any of these things:

- Sign up to a mailing list
- Submit a query or request a quote or other information
- Ask to be contacted by us Contact your local branch (including providing your location)
- Create an account or log in to a secure area

### **Customers: The personal information we collect about you and how we use it**

If you purchase products or services from us, we may use your personal information in the following ways:

- to respond to your enquiries;
- to keep you informed about our products and services;
- to process your order and to follow up on orders that are not completed;
- to arrange site visit (e.g. to carry out a survey or installation);
- to manage your account, including carrying out identity checks where relevant;
- to manage your credit account (if applicable) including carrying out credit checks;
- to use your purchase history to manage rebates and supplier claimbacks;
- for market research purposes;
- to publish trends and/or to improve usefulness and content of our website;
- to track activity on our site and to provide a more personalised online experience;
- to link with social media sites and services, for example, for advertising purposes;
- to notify you about important changes or developments to our site or services;
- to manage deliveries, returns and refunds;
- for product liability purposes;
- to deal with enquiries and complaints;
- for claims management and insurance purposes; and
- for record keeping purposes.

## **Suppliers: The personal information we collect about you and how we use it**

If you supply products or services to us, we may use your personal information in the following ways:

- for order processing and management;
- to manage deliveries, installations, returns and refunds;
- for product liability purposes;
- to manage your account, including conducting credit and other background checks where applicable;
- for market research purposes;
- to notify you about important changes or developments to our websites or services;
- for supply chain management;
- to deal with enquiries and complaints;
- for claims management and insurance purposes; and
- for record keeping purposes.

If you are a supplier and you have any questions about how we use your personal information, please contact accounts on [accounts@surfaceprotection.co.uk](mailto:accounts@surfaceprotection.co.uk) or your usual business contact.

### **More details about how we use different types of personal information are set out here:**

Personal information is any information relating to an individual who can be identified directly or indirectly, often by name, account number, location, an online identifier or other factors specific to their identity.

<b>Personal Information</b>	<b>Purpose of Use</b>
<b>Contact details:</b> Name, address, business, job title, email address, telephone number, location	<ul style="list-style-type: none"> <li>● Responding to enquiries</li> <li>● Account management</li> <li>● Managing marketing preferences</li> <li>● Personalising advertising</li> <li>● Market research, surveys and advertising</li> <li>● Website security and tracking website use</li> <li>● Linking with social media services</li> </ul>
<b>Order details:</b> Contact details, products, services, date & time of order/visit/delivery, delivery details, delivery addresses, delivery photographs, survey or installation details including photographs, payment method, payment details, refunds, claims, surveys and feedback	<ul style="list-style-type: none"> <li>● Order processing and fulfilment</li> <li>● Deliveries, returns, refunds</li> <li>● Quality assurance</li> <li>● Account management</li> <li>● Rebates and claimbacks</li> <li>● Customer analysis and research</li> <li>● Market research, surveys and advertising</li> <li>● Product liability</li> <li>● Handling enquiries and complaints</li> <li>● Claims and insurance purposes</li> <li>● Fraud prevention and detection</li> </ul>
<b>Account details:</b> Contact details, passport/driving licence or other identity documents, order details, business type, sector, payment history, account status, purchase history and trends	<ul style="list-style-type: none"> <li>● Account management</li> <li>● Following up incomplete transactions</li> <li>● Handling queries</li> <li>● Identity verification</li> <li>● Customer analysis and research</li> <li>● Market research, surveys and advertising</li> <li>● Payment and debt management</li> <li>● Rebates and claimbacks</li> </ul>
<b>Credit Account details:</b> Contact details, credit reference checks, order details, payment history, account status, credit limit	<ul style="list-style-type: none"> <li>● Account management</li> <li>● Verification of identity and credit rating</li> <li>● Handling queries</li> <li>● Payment and debt management</li> <li>● Rebates and claimbacks</li> </ul>

## How your information is accessed within Surface Protection Coatings Ltd

We use centralised finance, supplier and customer management systems. Your information may be accessed by others in the company for administrative and analytical purposes.

### Keeping You Informed

If you sign up to receive email updates or have bought or enquired about our products or services, we may use the information we collect to let you know about our other products and services which may be of interest to you and to keep you updated with information about promotional offers and what is coming soon.

If you agree, we may pass your information to suppliers and manufacturers who are interested in getting in touch with you about their products and services.

You can opt out of receiving marketing communications from us at any time. You can also opt out of receiving marketing which is tailored to suit your customer profile.

## Call Recording

Phone calls are not recorded by Surface Protection Coatings Ltd

## Legal Basis for Processing

Some of the information we collect is provided by you voluntarily (and therefore with your permission), for example when you sign up to join a mailing list or submit a query.

If you purchase from us, or if you supply products or services to us, most of the information we collect is necessary so that we can fulfil the contract between us.

The remainder of the information is collected for our legitimate business purposes, which include:

- To keep in touch with current, past and prospective customers
- To provide online account management and related services
- To gain an understanding of how our customers interact with us so we can provide the most relevant products and services
- To monitor the use of our website and improve its facilities
- To identify suspected criminal activity and take appropriate action
- To manage our supply chain and the relationship with our suppliers (including the management of rebates and claimbacks)
- To protect and defend our rights

When we collect personal information from you we will indicate whether it is mandatory or voluntary – this is done on the website by using asterisks to mark mandatory fields.

## Retention

We will retain your personal information for as long as needed for the legitimate business purposes described above.

If you are a visitor to the website, we will retain your information for a limited period in order to respond to your query, provide you with the information you require or to send you updates on our products and services for as long as you indicate that you are happy for us to do so.

If you make a one-off purchase, we normally keep records of the transaction for 7 years. If you are an account customer or a supplier, we normally keep records for 7 years after the closure of your account or the last purchase or sale you made. In all cases, this is for accounting, tax and product liability purposes.

Your information may be retained for longer than this if there are valid legal grounds for us to do so, for example if required by law or court order, or as needed to defend or pursue legal claims.

## **Working with Service Providers**

Like most organisations, we engage service providers to run our website and IT systems, to help us administer accounts, to conduct credit checks and fraud screening, and to handle postal and email marketing campaigns. We also work with a large number of suppliers who provide products and delivery services to us.

We will only provide these companies with the information they need to deliver the service we have engaged them for and they are prohibited from using that information for any other purpose. Whenever we share personal information about our customers or visitors to our website with our service providers, we will put in place contracts which require the service provider to protect the information and keep it secure.

## **Other Disclosures**

Your personal data may be disclosed to the following third parties for the purposes described above:

- tax, customs and excise authorities
- regulators, courts and the police
- fraud screening agencies
- central and local government
- insurance companies
- other professional advisors

We may also disclose your personal information if we believe that the disclosure is necessary to enforce or apply our terms and conditions or otherwise protect and defend our rights, property or the safety of our customers and other users of the website.

## **Security**

We are committed to safeguarding the personal information you provide to us. We use appropriate measures to protect the information that you submit through our website and the information we collect and store about our customers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of information you submit via our website and any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organisational measures to safeguard your personal data against loss, theft and unauthorised use, access or modification.

If you have created an account or registered to use any online services, your account details may be password protected. It is your responsibility to keep your password confidential and to sign out once you have finished browsing.

## Changes to this policy

Any changes to this privacy policy will be posted here. Please refer back to this page regularly.

## Links to other websites

Links may be provided on our website to other websites that are not operated by us. If you use these links, you will leave our website. You should note that we are not responsible for the contents of any third party website. External sites will have their own privacy policies which you should read carefully.

## Your Rights

### *Marketing*

You can opt out of receiving emails at any time by emailing [Sales@surfaceprotection.co.uk](mailto:Sales@surfaceprotection.co.uk)

You will still receive generic marketing unless you opt out of receiving marketing entirely.

### *Access and Correction*

If you would like to correct or update any of your other personal information, or if you would like a copy of the personal information we hold, please contact our Data Protection Officer at the address below. We may need to ask for proof of your identity before we can respond to your request.

### *Other Rights*

You may also have the following rights in relation to your personal information:

- in certain circumstances, the right to restrict or object to the processing of your personal information, or request that your personal information is deleted
- where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent
- in certain circumstances, the right to receive a copy of the personal information which you have provided to us, in a structured, commonly used and machine-readable format or to request that we transfer that information to another party (known as “data portability”)
- the right to complain to a Data Protection Authority (see further below)

If you have a query about this privacy policy or wish to exercise your rights, please contact the Group’s Data Protection Officer by writing to them at:

**Surface Protection Coatings Ltd, 66 Church Street, Littleborough, OL15 8AU**

If you are not satisfied with our use of your personal information or our response to any request made by you in relation to your personal information, you have a right to make a complaint to the Information Commissioner:

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow  
Cheshire SK9 5AF Tel: 0303 123 1113 (local rate) or 01625 545745 (national rate) Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)