

## GDPR Privacy Policy

**Palatine Paints and Chemicals Ltd** are committed to protecting and respecting your privacy.

This notice (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This notice applies to the use we make of data we hold whether you are an existing customer (or employee of an existing customer and we need to communicate with you), a supplier (or employee of a supplier and we need to communicate with you), a prospective customer (or employee of a prospective customer and we need to communicate with you) (such as where we are negotiating provision of services to you or we have met you at a trade event or you have otherwise shown an interest in our services) or where, through research and other data sources in the public domain, we consider that you may be interested in our services.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We, us and our, refer **Palatine Paints and Chemicals Ltd**. We are registered in England and Wales and have our registered office at **55 Smallbrook Lane, Leigh, Lancashire, England, WN7 5PZ**. We are the controller of all the data referred to in this privacy notice.

We operate the following websites (sites): <https://www.palatinepaints.co.uk/>

Our Data Protection Officer, **Vicky Robinson** is contactable by telephone on **01942 884122**, or by post at Office at above address.

Information we collect from you.

We will collect and process the following data about you:

Information you give us.

This is information about you that you give us by completing forms on our sites or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you:

use our sites.

subscribe to any services offered by us (such as the Customer Portal).

Register to receive our downloadable information, newsletters or other information.

Send us a request to contact you or when you report a problem with our sites.

supply services to you (or your employer) or procure services from you (or your employer)

The information you give us may include your name, position and employer details, e-mail address and telephone number. Unless otherwise agreed with you we will

only collect this basic personal data about you which does not include any special categories of personal information.

We only work with businesses or otherwise communicate with contacts for commercial purposes. Accordingly, we assume that where you have given us contact details or we have sourced such contact details from other sources (public or commercial lists) you expect to receive commercial communications via these contact details. If that is not correct, please let us know as soon as possible as we do not wish to impose on your personal life in any way. Email as above to let us know.

Information we collect about you.

About each of your visits to our sites we will automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform.

information about your visit, including items you viewed or searched for, page response times, length of visits to certain pages and any phone number used to call our business.

Information we receive or gather from other sources.

if you are a user of our services and have a unique log-in to use those services

from our third-party service providers (including, for example, sub-contractors in technical and delivery services, analytics providers, search information providers)

if we have undertaken research into potential customers or purchased commercial lists.

If you are a user or have been a user of our services, your personal details will be recorded on our CRM database and we will cross-check information you give us with the information recorded on our CRM database.

We endeavour to check data sources and if you are listed on the CTPS or any other commercial preference system we apologise for contacting you and ask you to let us know if you no longer wish to hear from us in respect of marketing information.

Purpose for processing your information.

We need to know basic personal information to provide you with the services that you have engaged us to provide and to assert our right to be compensated in return for those services as per the services agreement or other contract in place between us. If you do not provide this information, we will not be able to provide the services and we will not collect personal data from you that we do not need for this purpose without your consent.

All the personal data we hold about you will be processed by our staff in the UK.

Transferring data outside of the EEA

We do not process any data outside of the European Economic Area (EEA)

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Please be aware that your information may be stored on a cloud-based system whose servers may be located outside of the EEA.

Personal data we hold.

We will use this information:

to send you any information you have requested.

to provide you with the services you have requested.

communicate with you about services you have requested or otherwise.

to provide you with news and information which we think may be of interest to you and with information about our products and services. If you no longer wish us to use your data in this way, please let us know by contacting us at above email address or, where available, selecting unsubscribe button on our communications.

for the purposes of market mapping and customer base analysis so that we understand the potential market for our goods and services better and can tailor our goods and services to meet market and customer desires.

to ensure that content from our sites is presented in the most effective manner for you and for your computer.

to administer our sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

to allow you to participate in interactive features of our services, when you choose to do so; and

as part of our efforts to keep our sites secure.

Legal basis for processing your information.

The legal basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

where the processing is necessary to carry out for the performance of a contract with you

where the processing is necessary for us to comply with a legal obligation; or

where it is in our legitimate interests to perform our functions.

Generally, we do not rely on consent for processing data other than in relation to sending third party marketing communications to you via email. Where we have sought, and you have given consent for this you can withdraw your consent at any time by emailing us at the above email address.

We will not rent, swap, or sell your personal information to other organisations for them to use in their own marketing activities.

#### Sharing your information

We may share data with third parties as applicable to the services you may have requested such as our service partners listed within our client hub and by access from our website.

We may pass your personal data on other third-party service providers contracted to us during dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures.

We may also share your personal information with analytics and search engine providers that assist us in the improvement and optimisation of our sites.

We may also disclose your personal information to third parties:

If we or substantially all our assets are acquired by a third party, in which case personal data held about our prospects and customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our website terms of use and/or terms of services - or other agreements entered with us; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

If you make a claim against us (such as our legal advisors and insurance providers)

#### Retention of your personal data

We will only keep your personal data within the timeframes allowed by law and for so long as is necessary to comply with our legal obligations or otherwise according to the relevant processing activity and use we have for the data. The length of time we keep your data will depend on the type of personal data we have collected. Please contact us at the above email address for details of any specific retention period.

#### Marketing activities

From time to time we may contact you with details of other services which we provide unless you let us know you no longer wish to receive this information.

Recipients of marketing information from us will either do so because we consider that it is a legitimate interest as they:

1. already engage with us to pursue one or more projects together; or
2. have a legitimate interest in the products and services we offer, either as a previous customer, because we have gathered your contact details through networking or research and where such interests are not overridden by the interests of any individual's fundamental rights and freedoms which require protection of personal data.

We only work with businesses or otherwise communicate with contacts for commercial purposes. Accordingly, we assume that where you have given us contact details or we have sourced such contact details from other sources (public or commercial lists) you expect to receive commercial communications via these contact details. If that is not correct, please let us know as soon as possible as we do not wish to impose on your personal life in any way.

Under the terms of the General Data Protection Regulations, recipients of marketing emails from us may opt out of receiving any further marketing correspondence from us. Please contact us at the above email address and let us know you no longer wish to receive marketing information from us.

Where you opt out as above this will not apply to our use of your contact details or other personal data where we need to process it for contractual purposes or legal obligations.

#### Your rights

At any point while we are in possession of or processing your personal data, you have the following rights:

Right of access – you have the right to request a copy of the information that we hold about you.

Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

Right of portability – you have the right to have the data we hold about you transferred to another organisation.

Right to object – you have the right to object to certain types of processing such as direct marketing.

Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

You can exercise your rights at any time by contacting us at the above email address. You have a right to ask for a copy of any personal data held by us. We will provide all information in response to your request free of charge and within twenty days provided you have confirmed your identity or other simple checks.

Our sites may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

If you have any cause for complaint about our use of your personal data, please contact us and we will do our best to solve the problem for you. If we are unable to help you have the right to lodge a complaint with the Information Commissioner's Office: <https://ico.org.uk/concerns/>

#### Our use of Cookies

We do not use cookies within our websites.

#### Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.

#### Contact

If you have any questions, comments and requests regarding this privacy notice please contact us at the above email address.

Signed: *Vicky Robinson*

Position: IMS Manager

Date: 1<sup>st</sup> November 2021