

FREDERIC SMART AND SON LIMITED (FSS)

PRIVACY NOTICE

This privacy notice provides you with details of how we (FSS) collect, store and process your personal data.

1. DATA PROTECTION

It is very important that the information we hold about you is accurate and up to date. Please let us know if your personal information changes by emailing gdpr@frederic-smart.co.uk. If you are unhappy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioners Office (www.ico.org.uk). However, we would prefer you to contact us first if you do have a complaint so that we can try and resolve it for.

Email: gdpr@frederic-smart.co.uk Telephone: 01480 832100

2. WHAT PERSONAL DATA WE COLLECT

Personal Data is any information capable of identifying an individual and does not include anonymised data. We may process certain types of personal data about you including:

- **Identity Data** may include your first name, last name, title, date of birth, gender, national insurance number, photographs and images
- **Contact Data** may include your home, work and/or billing address, email address(es) and telephone and fax number(s)
- **Financial Data** may include your bank account and payment card details
- **Transaction Data** may include details about payments between us and other details of purchases or sales made by you
- **Technical Data** may include login details, internet protocol addresses, browser type and version, social media handles, browser plug-in types and versions, time zone settings and location, operating system and platform and other technology on the devices you use to access our website
- **Profile Data** may include your username and password, previously used services, your interests, preferences, feedback and survey responses
- **Usage Data** may include information about how you use our services, website and operating systems
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences

Sensitive Data

We do not collect any sensitive data about you including details about your race or ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, health, criminal convictions and offences

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide that data when requested, we may not be able to perform the contract.

3. HOW WE COLLECT YOUR PERSONAL DATA

We will obtain personal data about you whenever you:

- Transact with us
- Subscribe to our mailing list or communicate with us by post, phone or email
- Complete a form on our website
- Attend one of our events
- Request resources or marketing material be sent to you
- Provide feedback

Automated technologies

We may monitor your use of our website including how many times you visit, which pages you go to, traffic data, location data, weblogs and other communication data whether required for billing purposes or otherwise, the originating domain name of a user's internet service provider, IP address, operating system or browser type. This information helps to build a profile of our users. Most of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

Third parties or publically available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Analytics providers such as Google based outside the EU
- Advertising networks such as Google AdWords based outside the EU
- Search information providers such as Google based outside the EU
- Contact, financial and transactional data from providers of technical, payment and delivery services based inside the EU
- Identity and contact data from publically available sources such as Companies House and the Electoral Register based inside the EU

4. CCTV

We employ CCTV on our premises in order to:

- Prevent, deter and detect crime
- Apprehend and prosecute offenders, and provide evidence to take action in the courts
- Help provide a safer environment for our staff and visitors
- Monitor operational and safety-related incidents
- Assist with the verification of claims

You have the right to make a Subject Access Request for CCTV images of yourself and to ask for a copy of them. Please direct any such request to gdpr@frederic-smart.co.uk

We reserve the right to withhold information where permissible by the applicable data protection legislation, and we will only retain CCTV images for a limited period or as long as is required by law. In certain circumstances, we may need to disclose CCTV images for legal reasons. When this is done, there is a requirement for the organisation that has received the images to adhere to the relevant data protection legislation.

5. HOW WE USE YOUR PERSONAL DATA

We will use your personal data for any one or more of the following purposes:

- Where it is necessary to perform the contract between us
- Where it is necessary for our legitimate interests
- For marketing purposes
- Where we need to comply with a legal or regulatory obligation

Generally, we do not rely on consent as a legal ground for processing your personal data. You have the right to opt out of receiving marketing communications at any time by emailing us at gdpr@frederic-smart.co.uk

6. WHY WE PROCESS YOUR PERSONAL DATA

The table below sets out how we intend to use your personal data and the legal grounds on which we will process such data.

We may process your data for more than one lawful ground, depending on the specific purpose for which we are using your data

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer or supplier	<ul style="list-style-type: none">• Identity• Contact	<ul style="list-style-type: none">• Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to complete a feedback survey	<ul style="list-style-type: none">• Identity• Contact• Profile• Marketing and Communications	<ul style="list-style-type: none">• Performance of a contract with you• Necessary to comply with a legal obligation• Necessary for our legitimate interests to keep our records updated and to study how customers and suppliers use our products and services
To administer and protect our business, our brand and our website (including troubleshooting, data analysis, testing, system maintenance, support reporting and hosting of data)	<ul style="list-style-type: none">• Identity• Contact• Technical	<ul style="list-style-type: none">• 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 <ul style="list-style-type: none"> • Necessary to comply with a legal obligation
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile 	<ul style="list-style-type: none"> • Necessary for our legitimate interests to develop our products and services and grow our business

7. MARKETING COMMUNICATIONS

We would like to send you information about services, products and news which we believe may be of interest to you. You will receive marketing communications from us if you have:

- Requested information from us or have used our services
- Attended an event of ours previously
- Agreed or requested to receive a newsletter

You have the right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted, please email gdpr@frederic-smart.co.uk

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a service experience.

Change of Purpose

We will only use your personal data 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 we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

8. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties including:

- Service providers who provide IT and system administration services
- Professional advisors including lawyers, bankers, auditors, insurers, financial advisors and corporate finance advisors who provide consultancy, banking, legal, insurance, accounting and financial services

- H M Revenue and Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances
- Third parties to whom we sell, transfer or merge parts of our business or our assets.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

9. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Some of our third party service providers are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certain certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States of America, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the USA

If none of the above safeguards are available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

10. DATA SECURITY

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

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

11. DATA RETENTION

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

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law, we have to keep basic information about our customers and suppliers (including contact, identity, financial and transaction data) for six years after they cease being customers or suppliers for tax purposes.

In some circumstances, you can ask us to delete your data; see below for further information.

In some circumstances we may anonymise your personal data (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.

12. YOUR LEGAL RIGHTS

Under certain circumstances you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing of your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please email us at gdpr@frederic-smart.co.uk

You will not have to pay a fee to access your personal data (or to 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

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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.

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 if you have made a number of requests, In this case, we will notify you and keep you informed.

13. THIRD PARTY LINKS

Our website may include links to third party websites, plug-ins and applications, Clicking on those links or enabling those connections 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 of every website you visit.

14. COOKIES

When you visit our website, a certain amount of information is retained regarding the event to enable us to understand the profile of our visitors using cookies from Google. The information retained includes the IP addresses and/or the domain name of the visitors,

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 our website may become inaccessible or not function properly.

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