



## Changes to our Privacy Policy

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page so please ensure to check back regularly for updates, a printed version of this policy is available on request via emailing [dpo@suntradewindows.com](mailto:dpo@suntradewindows.com). By continuing to use the services and our website, or to offer and/or provide services to us you are confirming that you have read and understood the latest version of our privacy policy.

### 1: What Information Do We Collect?

- a When setting up your account we collect your name, address, telephone numbers and email address.
- b When you enter your details on our web site we'll ask for your name, address, telephone numbers and email address.
- c If visiting our website we use cookies, which monitor the pages you use to help us provide a better online experience, to read more on this please review our cookie policy.
- d As part of our commitment to customer care and continuous improvement all calls into and out of Suntrade Windows may be recorded to help us with quality and training.

Each time you visit our website we may automatically collect any of the following information on our visitors;

- a Information about our website visitors:
- b Technical information, including the Internet protocol (IP) address used to connect your computer to the internet, domain name and country which requests information, the files requested, browser type and version, browser plug-in types and versions, operating system and platform;
- c Your user name;
- d Your age;
- e Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads; and
- f If you are a user of a mobile application, your location data so that we can help you to locate our products and services and, if you are a service provider, so that we can monitor the effectiveness and efficiency of any services that you provide to us.

Each time you visit our website we may automatically collect any of the following information on the products or services we provide to you:

- a Information needed to provide goods or services to you (including information on account opening forms, details of your order, order history, payment details, delivery address, delivery requirements and restrictions, trade references and tax information);
- b The name you give us for personalised products;



- c Customer services information; and
- d Customer relationship management and marketing information.
- e If you choose to use social media in order to contact us or find out about our products or services, your profile information (including your preferences and interactions with us on Facebook, Instagram and Twitter) and information which you post on message boards which are relevant to our business.

If you are a journalist or work for an institution/trade association in our industry, we may collect information about you from public sources.

If you are a customer or a supplier (or a potential customer or supplier) or work for one of them (including as a consultant), we may obtain information about you from your company's website.

If you visit one of our showrooms, CCTV footage may be captured as we use this to ensure the security of our staff and visitors, to maintain physical security of our properties.

## **2: How Do We Use This Information?**

We collect, use and store your personal information for the following reasons:

- To allow our advisers, agents and sales representatives to follow up our service, either by email, telephone, text or mail, as part of our customer care procedure;
- To help us to understand your needs and provide a better service;
- To help us to improve our products and services;
- To enable us to occasionally contact you for market research purposes;
- To enable us to send you information about new products, special offers or other information that we think you may find interesting;
- To administer our websites;
- To improve your browsing experience by personalising the website; to provide third parties with statistical information about our users – but this information will not be used to identify any individual user;
- To facilitate our internal record keeping;
- To enable you to participate in our competitions and promotions;
- To carry out marketing analysis and applicant profiling (including with transactional information) and create statistical and testing information;
- To help to prevent and detect fraud or loss;
- To process orders which you place for goods or services from us;
- To prepare before and after photographs of enhancements to your property to use for marketing purposes;
- For improvement and maintenance of our website and the app and preparing reports or compiling statistics in order to improve our goods and services. Such details will be anonymised as far as is reasonably possible and you will not be identifiable from the information collected;



- To monitor your interactions with us and our brand online, if you contact us on social media, including Messenger and WebChat, where it is in our legitimate interests to do so for market research and for planning future marketing campaigns;
- To amplify an event to a broader audience and for internal presentation purposes, we may use your photograph or video footage from an event where it is in our legitimate interests for marketing and business development purposes or where we have your consent; and
- To contact you to invite you to write a news article about our products and services; to invite you to events, send you promotional material and for press releases if you are a journalist, where it is in our legitimate interests.

#### **Receiving goods and services from you:**

- To enable us to receive and manage services from you (including supplier due diligence, payment and expense reporting and financial audits);
- For health and safety records and management;
- To assess your working capacity (for example, to assess whether you are under the influence of drugs or alcohol and thereby pose a danger to yourself and to others);
- To confirm information on CVs and performance reference checks, to assess you or your employer's suitability to work for us; and
- For equal opportunities monitoring.

#### **Providing goods and services to you:**

- To provide relevant goods or services to you or your employer (including, to confirm and process orders, for administration of your account with us, customer loans, tax and export, billing and debt collection purposes and the collection of bottles (where applicable));
- To deal with any enquiries or issues you have about our goods and services, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- To send you certain communications (including by email or post) about our goods and services such as service announcements and administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our fees and charges);
- To allow you to attend our events or participate in competitions and to send you photos that you have permitted us to take of you;
- For health and safety and quality assurance;
- To carry out statistical analysis and market research;
- To contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters), but only where you have consented to this;
- To identify and implement business efficiencies and for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development;



- To comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so.
- To establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

Where appropriate, we will seek your consent to undertake some of these activities.

When you use our web site, and have not advised us otherwise, you are agreeing that we may use your personal information for the purposes of this policy.

### **3: Use Of Your Family And Next Of Kin Information**

Separately, we may process personal information about your family and next of kin for the purposes of provision of services as requested by you. If you disclose information about your family in written, electronic or phone communications, we may also have access to this information on our systems.

### **4: Other Uses**

We will only process your personal information for the specific purposes listed above or for any other purposes specifically permitted by law. If we wish to process your personal information for any other purpose, we will update this Privacy Policy.

### **5: Legal Bases For Personal Information Use**

The legal basis that we rely upon 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:

- a where the processing is necessary to carry out the performance of a contract with you;
- b where you have provided your consent to allow us to use your data in a certain way
- c where the processing is necessary in order for us to comply with a legal obligation; or
- d where none of the above apply, it is necessary for the purposes of our legitimate interests or the legitimate interests of a third party (for example, to ensure a safe working environment, to ensure the reliability of our employees or to maintain adequate personnel record).

Where we are relying on our legitimate interests or the legitimate interests of a third party, we have explained, in the relevant parts of this privacy policy, what those legitimate interests are.

Where we collect and process more sensitive categories of personal information (for example, health information in the event of access issues, then we will only process such information:

- Where we reasonably need to do so in order to comply with our legal obligations; or
- Where you have given us your consent.



## 6: Service Providers

We use service providers (e.g. installers, service engineers, locksmiths) to help us provide you with our services. Your personal information will be made available to other Suntrade employees, temporary staff and contractors, agencies and suppliers in the course of providing our services.

We may also share your personal information with our group companies where they provide products and services to us, such as information technology systems, human resources services and employee monitoring.

Your personal information may be shared with any company that is a member of our group, which includes our ultimate parent company, Dunraven Manufacturing LTD, where we consider that it is in our legitimate interests to do so for internal administrative purposes, corporate strategy, auditing and monitoring and research and development.

Access to your personal information is limited to those employees who need to know the personal information, and may include corporate services, legal, information technology, and finance departments, internally.

## 7: Disclosing Your Information

In the course of processing your enquiry or order with Suntrade, this may require us to give information to third party companies we deal with. We've taken steps to ensure that all these companies have the same level of data protection as Suntrade.

The personal details you give us may also need to be used as part of a third-party data processor's assessment to provide Suntrade with data accuracy, integrity and validity services.

We will share your personal information with the following categories of third parties:

- Other parties such as legal and regulatory authorities, accountants, auditors, lawyers and other outside professional advisors; and
- Where it is in our legitimate interests to do so to run, grow and develop our business:
  - a If we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
  - b If Suntrade or substantially all of its assets are acquired by a third party, in which case personal information held by Suntrade will be one of the transferred assets;
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- To enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- To protect the rights, property or safety of Suntrade, our employees, customers, suppliers or other persons.



Some of these companies (including our group companies) may use your data in countries which are outside of the European Economic Area.

We safeguard the sharing of such information by using formalised data processing agreements with organisations where appropriate, or on an ad hoc basis after ensuring the request and disclosure are legally compliant.

Examples of third parties we use:

- Hitachi Capital (UK) Ltd
- Shawbrook Bank Limited
- Robert M Strongward Debt Collection

## **8: Restrictions on use of personal information by recipients**

Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party to use in their own marketing activities, without notifying you and/or obtaining your consent. Where you have given your consent for us to use your information in a particular way, but later change your mind, you should contact us and we will stop doing so.

## **9: Cookies**

Some parts of our website use cookies, which monitor the pages you use to help us provide a better online experience. A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. We use session cookies to keep track of you whilst you navigate our websites. Session cookies will be deleted from your computer when you close your browser. We use persistent cookies to enable our website to recognise you when you visit. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date. Read more about our Cookie Policy on our website.

## **10: Marketing**

We may collect and use your personal information for undertaking marketing by email, software app, telephone and post.

We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes. However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.



If you wish to stop receiving marketing communications, you can contact us by email at [marketing@suntradewindows.com](mailto:marketing@suntradewindows.com) at any time or by calling 01656 746 650 during business hours.

### **11: Data Research And Accuracy**

On occasion we may also use your personal information for research purposes so that we can improve our services. This may include us contacting you to see if you would like to become involved in one of our research projects. We also feature case studies on our website and materials to use in our selling processes. In both instances we will always obtain your prior consent before using your data in these ways.

We continually strive to improve the quality and accuracy of the information you have provided, such as your contact details, by checking against external data lists such as the Post Office's National change of Address database, The National Deceased Register, the Telephone Preference Service (TPS), the Mail Preference Service (MPS), Call Credit. This helps us to ensure that our records are fully up-to-date and to avoid mis-directing communications.

### **12: Data Profiling And Analysis**

We use Google Analytics to analyse the use of our websites. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/policies/privacy/>.

We may also carry out analysis of the personal information we collect about you and add publicly available information to create a profile of your interests and home improvement related preferences, for example, using a company called Periscopix. This is so that we can contact you in the most appropriate way and with the most relevant information, which enables us to operate our business more cost-effectively. This information is compiled from sources such as public registers, the electoral roll, newspaper articles and social media posts.

### **13: Your Rights**

You have certain rights in relation to your personal information under data protection legislation. These rights are covered in more detail in a separate guidance policy document (DPA 08 Your Rights under GDPR). You have the right to request

that we:

- Provide access to any personal information which we hold about you;
- Update any of your personal information which is out of date or incorrect;
- Delete any personal information which we hold about you;
- Restrict the way that we process your personal information;
- Provide your personal information to a third-party provider of services;
- Provide you with a copy of any personal information which we hold about you; or
- Consider any valid objections which you have to our use of your personal information.



If we have asked for your consent to collect and use certain types of personal information for certain activities (for example, for profiling your web activity) or consent to market to you, you may withdraw your consent at any time, by emailing [marketing@suntradewindows.com](mailto:marketing@suntradewindows.com) or writing to Suntrade Windows, Dunraven House, Stormy Down, Pyle, Bridgend CF33 4AH.

We will consider all such requests and provide our response within a reasonable time period required by law – without undue delay and in any event within one month of receipt of the request. Please note, however, that certain personal information may be exempt from such requests in certain circumstances.

If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

#### **14: How Long Will Your Information Be Held?**

We keep your personal information for no longer than necessary for the purposes for which the personal information is used or otherwise processed. We review our retention periods for personal information on a regular basis. The length of time we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws. We are legally required to hold some types of information to fulfil our contractual obligations with you. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

#### **15: Transfers Of Information**

The personal information may be processed by third party data processors for the purposes mentioned in this policy. If we provide any personal information about you to any non-EEA third party data processors, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy. These measures include:

- In the case of US based service providers, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or
- In the case of service providers based in other countries outside the EEA (including Japan), entering into approved standard contractual arrangements with them.

#### **16 : Security**

Suntrade is committed to protecting personal information from loss, misuse, disclosure, alteration, unavailability, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information, including through use of appropriate organisational and technical measures. Organisational measures include physical access controls to our premises, staff training and locking physical files in filing cabinets. Technical measures include use of encryption, passwords for access to our systems and use of anti-virus software.



In the course of provision of your personal data to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information between you and us over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to us over the internet and that any such transmission is at our own risk.

Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

Where we have given you (or where you have chosen) a password which enables you to access our systems or any portal or account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### **17: Third Party Websites**

This privacy policy only applies to the personal information that we collect from or about you and we cannot be responsible for personal information collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

Our website may contain links to enable you to easily visit other websites of interest. Once you leave our site, remember that we cannot control the protection and privacy of any information you provide to another site.

We may request that you complete satisfaction surveys or feedback, sometimes using independent online review systems. These are externally provided services. Please review their Terms and Conditions and related Privacy Policy content.

We may use third-party service providers who are authorised to place cookies, pixel tags or similar technologies on our websites, apps and services with our permission. These technologies help us to compile metrics and analytics (without collecting personally identifiable information) to help improve our websites, apps and services. Third-party cookies and technologies are covered by the third party's Privacy Policy.

### **18: Telling Us When Things Change**

You can help us keep our records up to date by telling us when your contact details and other personal information changes. If you request to receive no further contact from us, we will keep the information we hold on you and add you to our suppression lists to ensure that you do not receive unwanted communication in the future. This can be achieved by emailing [marketing@suntradewindows.com](mailto:marketing@suntradewindows.com).



## **19: Who We Are: Data Controller**

The data controllers responsible in respect of the information collected on this website are: Dunraven Manufacturing LTD, company number 2543224, a limited company registered at 39 Village Farm Industrial Estate, Pyle, Bridgend, CF33 6BJ. ("Dunraven") group companies Dunraven Windows Limited, data protection registration number Z9939363

## **20: Further Questions Or Making A Complaint**

If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact our Data Protection Officer – email [DPO@suntradewindows.com](mailto:DPO@suntradewindows.com) or write to Suntrade Windows, Dunraven House, Stormy Down, Pyle, Bridgend, CF33 4AH.

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information. A third-party administrative company may be used to support our complaint handling processes.

If you are not satisfied with the response from the Data Protection Officer, you can contact the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Telephone number: 01625 545745; Fax: 01625 524510; email: [mail@ico.gov.uk](mailto:mail@ico.gov.uk)).

Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.