

## **Privacy Notice**

We are updating our privacy policy as part of our compliance procedures with the GDPR or General Data Protection Regulation. The information contained within this policy is relative to the processing of personal information activities carried out by TuffX Processed Glass Ltd.

### **Who we are:**

TuffX Processed Glass Ltd is both a Data Controller & Data Processor in respect of personal information that we process in connection with our day to day business activities. All further references contained in this policy to “we,” “us” or “our” are references to TuffX Processed Glass Ltd.

Our business address is Nexus House, Randles Road, Knowsley Business Park, Merseyside L34, 9HX.

The purpose of this privacy notice is to keep you informed of the methods we use to collect and use personal data as part of our normal business activities, including information about the increased rights you have under GDPR in relation to the information we hold and the legal basis on which we are using it.

This privacy notice may be updated from time to time and any such updates will be posted on our website and we actively encourage you to visit our site to ensure you are kept informed of any changes to our policy.

### **Purpose for Processing Information**

- We process information to enable us to provide manufacturing services including delivery of our finished products.
- Promote our goods and services
- Maintain our accounts and records to support & manage our Customers, Suppliers and Staff.

### **The Information we Process:**

The collection and use of personal information will be limited to the minimum required to carry out one or more of the legal or legitimate purposes as stated in this notice. This information may include the following:

- Name and Address
- Date of Birth
- Contact details such as telephone number and E mail address
- Financial Information such as bank account details or credit or debit card details

### **How we Obtain Information**

Information is obtained by a variety of accepted methods.

- When you visit our website and complete an online enquiry form
- If you telephone us with an enquiry.
- Direct Marketing Services, we may obtain information via a Direct Marketing organisation with a view to providing you with Marketing Information that you have indicated may be of interest to you.
- Our own customer database, when you have entered into some form of contract with us. For example, purchasing goods manufactured by us, your information will be securely stored on our own electronic database and from time to time we may contact you with a view to keeping you informed of the latest technological developments and innovations that may be of interest.
- Publicly available information, we may use search engines to obtain information and contact details for companies and individuals for whom we feel our goods and services may be of interest.

### **Our Legal Basis for Processing Information**

We will only ever process or gather information where it is necessary to carry out our lawful business activities. All our data processing activities come under the headings of “legitimate interest”, “fulfilling a contract”, “legal obligation” or in the case of financial information “consent”

### **Processing activities under “Legitimate Interest”**

- General and order enquiries relative to the order and supply of manufactured goods
- Processing data for setting up credit accounts or processing cash sales.
- Contact customers about their order status to enable us to process, manufacture and deliver orders efficiently and make improvements to our service.

- Issue marketing communications designed to inform and develop products, services and applications to attract and retain customers.

### **Processing of Data Overseas**

Some personal data may be stored and processed in Australia, a country outside of the European Economic Area (EEA). This will only be done for complying with Audit and Accountancy procedures and would only be processed or accessed by the company Financial Director. Where such processing takes place, appropriate controls are in place to ensure that data is protected to the same standard as if it were being processed in the UK.

### **Retention of Personal Data**

We may retain Personal Data for the following purposes:

- Audit and Accountancy purposes
- Marketing, Sales processing and reporting purposes
- Fraud Prevention

Data will not normally be held longer than is necessary to achieve the aims and objectives already stated within this policy and will be securely disposed of when no longer required. In any event, data will not be kept by us for a period of longer than ten years ( in order to honour the 10 year guarantee we provide on our glass.)

### **Rights of Individuals**

The GDPR provides unprecedented rights to individuals over the processing and control of their personal data. Rights include the following:

- The right to request a copy of the information we hold, in the form of a SAR (Subject Access Request)
- The right to have any inaccurate personal information corrected and to have any out of date personal information deleted
- The right to withdraw consent, either implied or given at any time to having Personal Data being used to send an individual marketing material.
- The “right to be forgotten” Data subjects will have the right to request that we delete their personal data where they feel consent was not obtained, there is no longer a necessary purpose for collecting their data or we have no overriding legitimate grounds to process their information.

### **Sharing of Personal Data**

To fulfil our responsibilities under contract and to prevent fraud we would share Personal Information with the following:

- Credit reference agencies
- Suppliers and service providers
- Financial Organisations
- Police Services
- Security Organisations for the prevention of criminal or terrorist activity.

### **How to Complain**

If any individual feels that we have not processed their information in line with our Data Protection obligations and that they have been affected by our alleged non-compliance they should initially make a complaint in writing addressed to the “Person Responsible for Data Protection,” at the contact address supplied above.

If not satisfied with our response, a complaint can be raised with the Information Commissioner’s Office, the UK authority set up to enforce Data Protection Regulations. They can be contacted by visiting [www.ico.org.uk/global/contact-us](http://www.ico.org.uk/global/contact-us)