

## Who we are

The Customade Group ("the Group") includes **Fineline Aluminium Limited** (Co Reg 06278501), **Polyframe Doors Limited, trading as Virtuoso Doors** (Co Reg 02814410), **Polyframe Norwich Ltd** (Co Reg 09008412), **Stevenswood Trade Centres Limited** (Co Reg 09423498) and **Customade Group Trading Limited** (Co Reg No 10126446), (incorporating Atlas Glazed Roof Solutions, Hourglass Seal, Polyframe, and REAL Aluminium). Each individual company within the Group ("the Company" / "We") is a Data Controller. We share data within the Group, but always subject to this Fair Processing Notice.

We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information – that includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party.

You can get in touch with our Data Protection Team by email at [dpo@customade.co.uk](mailto:dpo@customade.co.uk) or by post to Group Data Protection /Company Secretary, Customade Group Trading Limited, Mile Thorn Works, Halifax HX1 4JR.

Our Fair Processing Notice explains how we use your personal data if you:

- visit our website or you interact with us on social media;
- are a supplier (or prospective supplier) to any company within the Group;
- are or have been a customer of any company within the Group;
- are (or work for) a business which might reasonably be expected to have an interest in, or requirement for, the types of products and services that we offer (in other words, a prospective customer)

This Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of Data Protection legislation including the General Data Protection Regulation (GDPR).

## How we use your personal information

We use your personal information to provide you with products and services, to comply with the law and enforce our legal rights, and to improve and market our products and services.

For example, we may use information about you:

- to respond to your request or enquiry;
- to process your order(s) or purchase(s) of our products and services;
- to perform any contract the Company has with you;
- for internal record keeping;
- to market our products which we think may be of interest to you;
- to notify you of changes in information and updates concerning our products and services;
- to invite you to participate in surveys; (participation is entirely optional and you will always have the choice of whether or not to disclose any information that may be requested);
- to contact you by post, e-mail or phone for any of the above reasons;
- for compliance with legal, regulatory and other good governance obligations.

These purposes are covered by the following lawful bases:

- We need to process your data for the performance of our contract with you;
- Our processing of your data is required by law;
- Our processing of your data is necessary for the exercise of the Company's legitimate business interests and needs.

If we seek your consent to process your data for any specific purpose, we will always make it clear to you at the time.

We do not collect sensitive information about you except when you specifically and knowingly provide it with consent.

## What data we collect

We may collect the following information:

- name and job title
- contact information including email address
- bank/financial details, where these are necessary to process payments as part of a contract between us
- your trading history with us or other companies within the Group
- credit references, when you wish to set up an account with us

## How we gather personal information

In addition to the information you provide to us directly, we collect personal information in a number of ways, for example from third party credit reference agencies, from trade show attendee lists, and from specialist providers of marketing data. Sometimes we may collect information from CCTV, which is used on our premises to ensure the safety and security of our staff, visitors and stock.

When you visit our website, we will automatically collect standard internet and website log information and details of patterns about how website visitors behave. The information we collect includes but is not limited to information about your Internet service provider, your operating system, browser type, domain name, the Internet Protocol ("IP") address of your computer (or other electronic Internet-enabled device, such as a smart phone), your access times, the website that referred you to us, the Web pages you request and the date and time of those requests. This may allow us to find out which parts of the site are popular or need changing. Our collection of site use information also involves the use of cookies.

## How we share data

We do not sell or rent your personal information to any third party.

We may share personal information within the Group for reasonable management, analysis, planning and decision making, including in relation to taking decisions regarding the expansion and promotion of our products and service offering, order or customer request fulfilment and for use by those companies for the other purposes described in this Policy.

Your personal information will be shared, on a 'need-to-know' basis, with our management, accounting, logistics, and other staff who properly need to know these details for their functions within the Company; with our professional advisers; and with third parties providing relevant services under contract to the Company or Group, to enable them to perform services on our behalf. We use a third party to distribute marketing materials on our behalf but they are required to keep your personal information secure and to use it only to carry out the marketing tasks we specify.

We may disclose specific information upon lawful request by government or other public authorities, law enforcement and regulatory authorities, when required or permitted by law and for tax or other purposes. Your personal information may also be made available to third parties or partners where necessary as part of any restructuring of the Company or sale of the Company's business or assets. Personal information may also be released to external parties in response to legal process, and when required to comply with laws, or to enforce our agreements, corporate policies, and Terms of Use, or to protect the rights, property or safety of the Company, our employees, agents, customers, and others, as well as to parties to whom you authorise the Company to release your personal information.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary for those purposes.

## Your rights and your personal data

You have a number of rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- Where we are processing your data with your consent, the right to withdraw your consent to the processing at any time;
- Where we are processing your data with your consent or because it is necessary for the performance of a contract with you, the right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability);
- Where we are processing your data in our legitimate interests, the right to object to that processing;

If you wish to exercise any of these rights, please contact us by email at [dpo@customade.co.uk](mailto:dpo@customade.co.uk) or by post to Group Data Protection Team /Company Secretary, Customade Group Trading Limited, Mile Thorn Works, Halifax HX1 4JR. We may need to ask for information from you to help us confirm your identity.

In addition, you have the right to lodge a complaint with the Information Commissioners Office.