

Protecting your privacy

CP Steel Processing Ltd

1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here but we want you to be fully informed about your rights, and how CP Steel Processing Ltd uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

2. Explaining the legal bases we rely on–

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you order an item from us for delivery, we'll collect your address details to deliver your purchase, and this may involve passing them to our courier for delivery.

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting CP Steel Processing Ltd to law enforcement.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your purchase history to send you or make available personalised offers.

We also combine the purchasing history of many customers to identify trends and ensure we can keep up with demand, or develop new products/services.

We will also use your email and address details to send you direct marketing information by post, telling you about products and services that we think might interest you

3. When do we collect your personal data?

- When you create an account with us
- When you purchase a product or service in a branch or by phone but don't have (or don't use) an account
- When you engage with us on social media
- When you download or install one of our apps
- When you contact us by any means with queries, complaints etc
- When you ask one of our employees to email you information about a product or service
- When you enter prize draws or competitions
- When you book any kind of appointment with us
- When you choose to complete any surveys we send you
- When you comment on or review our products and services
- When you fill in any forms. For example, if an accident happens, a representative of CP Steel Processing Ltd may collect your personal data
- When you've given a third party permission to share with us the information they hold about you
- We collect data from publicly available sources (such as Land Registry) when you have given your consent to share information or where the information is made public as a matter of law
- When you use our car parks and branches which usually have CCTV systems operated for the security of both customers and employees. These systems may record your image during your visit

4. What sort of personal data do we collect?

- If you have an account with us: your name, billing/delivery address, orders and receipts, email and telephone number
- Details of your interactions with us through contact centres, in branch and online
- *For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, how and when you contact us.*
- Copies of documents you provide to prove your age or identity where the law requires this (including your passport and driver's licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality

- We'll only ask for and use your personal data collected for recommending items of interest and to tailor your shopping experience with us. Of course, it's always your choice whether you share such details with us
- Payment card information
- Your comments and product reviews
- Your image may be recorded on CCTV when you visit a branch or car park.
- Your car number plate may be recorded at our car parks
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback

5. How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you

We then use this to offer you promotions, products and services that are most likely to interest you

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for

For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us

Here's how we'll use your personal data and why:

- To process any orders that you make by using our websites or in branch. If we don't collect your personal data during order completion, we won't be able to process your order and comply with our legal obligations

For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll do all of this as part of our legitimate interest

- To protect our customers, premises, assets and employees from crime, we operate CCTV systems in our branches and car parks which record images for security. We do this on the basis of our legitimate business interests
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by **email, web, text, telephone and through our contact teams** about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you relevant, personalised communications **by post** in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations
- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests
- To comply with our contractual or legal obligations to share data with law enforcement
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you

Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in your online account

- To build a rich picture of who you are and what you like, and to inform our business decisions, we'll combine data captured from CP Steel Processing Ltd, third parties and data from publicly-available lists as we have described in the section What Sort of Personal Data do we collect? We'll do this on the basis of our legitimate business interest

Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers or a fitter visiting your home). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request

6. Combining your data for personalised direct marketing–

We want to bring you offers and promotions that are most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data gathered across CP Steel Processing Ltd as described above. For this purpose we also combine the data that we collect directly from you with data that we obtain from third parties to whom you have given your consent to pass that data onto us – such as the Land Registry mentioned above

7. How we protect your personal data–

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it

We secure access to all transactional areas of our websites and apps using 'https' technology

Access to your personal data is password-protected, and sensitive data (such as payment card information) is secured by SSL encryption

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security

8. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning

Some examples of customer data retention periods:

Orders

When you place an order, we'll keep the personal data you give us for five years so we can comply with our legal and contractual obligations. In the case of certain products, if required by law, we'll keep the data for 10 years

Inactive accounts

If you've not used your account for more than five years, it will be flagged as inactive and we'll contact you to ask whether you want to keep it open. Unless you reply to say 'yes', we'll close the account and delete or anonymise the personal data associated with it

Warranties

If your order included a warranty, the associated personal data will be kept until the end of the warranty period

9. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties

For example, delivery couriers, technicians visiting your site, for fraud management, to handle complaints, to help us personalise our offers to you and so on

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services
- They may only use your data for the exact purposes we specify in our contract with them
- We work closely with them to ensure that your privacy is respected and protected at all times
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems
- Operational companies such as delivery couriers
- Direct marketing companies who help us manage our electronic communications with you

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes
- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration
- We may, from time to time, expand, reduce or sell CP Steel Processing Ltd and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice

An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases
- The correction of your personal data when incorrect, out of date or incomplete
- That we stop using your personal data for direct marketing (either through specific channels, or all channels)

- That we stop any consent-based processing of your personal data after you withdraw that consent
- Review by an employee of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision)

You can contact us to request to exercise these rights at any time as follows:

To ask for your information please contact The Data Protection Officer, CP Steel Processing Ltd, Building 144, Culham Number 1 Site, Station Road, Culham, Oxon, OX14 3DA or email sales@cpsteels.co.uk. To ask for your information to be amended please contact our customer services team on 01865 409300.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act

13. How can you stop the use of your personal data for direct marketing?

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular division
- Write to **The Data Protection Officer, CP Steel Processing Ltd, Building 144, Culham Number 1 Site, Station Road, Culham, Oxon, OX14 3DA**

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated

15. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office

You can contact them by calling **0303 123 1113**.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

16. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us on sales@cpsteels.co.uk
- Or write to us at

The Data Protection Officer

CP Steel Processing Ltd

Building 144

Culham Number 1 Site

Station Road

Culham

Oxon

OX14 3DA