# **Trustview Glazing Ltd – PRIVACY NOTICE**

Trustview Glazing Ltd (Company number 15169141) (we, us or our), understands that protecting your personal data is important. This Privacy Notice sets out our commitment to protecting the privacy of personal data provided to us, or otherwise collected by us when providing our Supply and/or installation of windows, doors, skylights and lanterns and general glazing services as well as any maintenance on windows, doors, skylights, lanterns and any article or accessory that may be attached and make up part of the product: website / mobile application (Services) or when otherwise interacting with you.

It is important that you read this Privacy Notice together with any other detailed privacy notices we may provide when we are collecting or processing personal data about you so that you understand our privacy practices in relation to your data.

#### The information we collect

Personal information: is information that relates to an identified or identifiable individual.

We may collect, use, store and disclose different kinds of personal data about you which we have listed below:

- Identity Data including first name, middle name, last name, title, date of birth, gender.
- Contact Data including billing address, delivery address, email address and telephone numbers.
- Financial Data including bank account and payment card details (through our third party payment processor, or Pay Pal.
- Background Verification Data including your (only when specifically requested by Trustview Glazing Ltd.)passport number, driver licence number, photographic identification or other details requested as part of our verification process to comply with our due diligence obligations, anti-money laundering laws and related ongoing monitoring commitments.
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and device and network information, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Profile Data** including purchases or orders you have made with us, support requests you have made, content you post, send, receive and share through our platform, information you have shared with our social media platforms, preferences, feedback and survey responses.
- Interaction Data including information you provide to us when you participate in any interactive features of our Services, including surveys, contests, promotions, activities or events.
- Marketing and Communications Data including your preferences in receiving marketing from us and our third parties and your communication preferences.
- Special Categories of Personal Data is a special category of personal data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. In the course of providing our Services, we may collect, or come across such special categories of personal data, in different situations including during the course of conducting a background verification check on you.

#### How we collect personal information

We collect personal data in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including through the 'contact us' form on our website or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as in emails, over the telephone and in your online enquiries.

- From third parties: We collect personal information from third parties, such as e.g. from your employer where they invite you to access our Services and details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.
- From publicly available sources: We collect personal data from publicly available resources such as Companies House and professional networking sites such as LinkedIn.

# Purposes and legal bases for processing

We collect and process personal data about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please reach out to us if you need further details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose of use / disclosure	Type of Data	Legal Basis for processing
To assess whether to take you on as a new client, including to perform anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks on you.	<ul> <li>Identity Data</li> <li>Contact Data</li> <li>Background verification Data</li> </ul>	<ul> <li>Performance of a contract with you</li> <li>To comply with a legal obligation</li> <li>Public interest</li> <li>Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities for example terrorism</li> </ul>
To provide our Services to you, including to dispatch and deliver our products to you, assess your application, manage your appointments.	<ul><li>Identity Data</li><li>Contact Data</li></ul>	<ul> <li>Performance of a contract with you</li> </ul>
To contact and communicate with you about our Services including in response to any support requests you lodge with us or other enquiries you make with us.	<ul> <li>Identity Data</li> <li>Contact Data</li> <li>Profile Data</li> </ul>	<ul> <li>Performance of a contract with you</li> </ul>
To contact and communicate with you about any enquiries you make with us via our website.	<ul><li>Identity Data</li><li>Contact Data</li></ul>	<ul> <li>Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions.</li> </ul>
For internal record keeping, administrative, invoicing and billing purposes.	<ul> <li>Identity Data</li> <li>Contact Data</li> <li>Financial Data</li> <li>Transaction Data</li> </ul>	<ul> <li>Performance of a contract with you</li> <li>To comply with a legal obligation</li> <li>Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our [terms of business] and any other administrative points.</li> </ul>
For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	<ul> <li>Profile Data</li> <li>Technical and usage Data</li> </ul>	<ul> <li>Legitimate interests: to keep our website updated and relevant, to develop our business, improve our Services and to inform our marketing strategy</li> </ul>

Purpose of use / disclosure	Type of Data	Legal Basis for processing
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul> <li>Identity Data</li> <li>Contact Data</li> <li>Technical and usage Data</li> <li>Profile Data</li> <li>Marketing and communications Data</li> </ul>	<ul> <li>Legitimate interests: to develop our Services and grow our business</li> </ul>
To run promotions, competitions and/or offer additional benefits to you.	<ul> <li>Identity Data</li> <li>Contact Data</li> <li>Profile Data</li> <li>Interaction Data</li> <li>Marketing and communications Data</li> </ul>	<ul> <li>Legitimate interests: to facilitate engagement with our business and grow our business</li> </ul>
If you have applied for employment with us; to consider your employment application.	<ul> <li>Identity Data</li> <li>Contact Data</li> <li>Professional Data</li> </ul>	<ul> <li>Legitimate interests: to consider your employment application</li> </ul>
To comply with our legal obligations or if otherwise required or authorised by law.		<ul> <li>To comply with a legal obligation</li> </ul>

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services. Further information about your rights is available below.

## Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers.
- marketing or advertising providers.
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as PayPal;
- our existing or potential agents or business partners;
- sponsors or promoters of any promotions or competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time), Facebook Pixel or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

**Google Analytics:** We have enabled Google Analytics Advertising Features including Remarketing Features, Advertising Reporting Features, Demographics and Interest Reports, Google Display Network Impression reporting etc.. We and third-party vendors use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together. You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found <u>here</u>. To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager <u>here</u> or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin <u>here</u>. To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

#### **Data retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

#### Your rights and controlling your personal data

**Your choice**: Please read this Privacy Notice carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Notice. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

**Information from third parties**: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Notice. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Access, correction, processing and portability: You may request details of the personal data that we hold about you and how we process it (commonly known as a "data subject request"). You may also have a right in accordance with applicable data protection law to have your personal data rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organisation.

**Unsubscribe**: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below.

**Withdraw consent**: Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Complaints**: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

#### Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our online Services. They include, for example, cookies that enable you to log into secure areas of our online Services, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies. These are cookies that allow us to recognise and count the number of visitors to our online Services and to see how visitors move around our online Services when they are using them. This helps us to improve the way our online Services work, for example, by ensuring that users find what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our online Services. These cookies enable us to personalise our content for you and remember your preferences (for example, your choice of language or region).

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose
Currency	This cookie stores the currency used for the online Services (AUD)
Language	This cookie stores the language used for the online Services (English)
PHPSESSIONID	This cookie contains a unique ID to support functions (for example last viewed products) to improve user experience
_ga / _gid / _gat	These cookies are used by our Google Analytics account to track customer traffic through the website to help us understand how our website is being used by our customers

### Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Notice.

### Personal information from social network accounts

If you contact us through our social media account, such as Facebook, Google and Instagram, we may collect your personal information from the social network. We will do this in accordance with the privacy settings you have chosen on that social network.

The personal information that we may receive includes your name, ID, user name, handle, gender, age, language, list of friends or follows and any other personal information you choose to share.

We use the personal information we receive from the social network to create a profile for you on our platform..

If you agree, we may also use your personal information to give you updates on the social network which might interest you. We will not post to your social network without your permission.

Where we have accessed your personal information through your Facebook account, you have the right to request the deletion of personal information that we have been provided by Facebook. To submit a request for the deletion of personal information we acquired from Facebook, please send us an email at the address at the end of this Privacy Notice and specify in your request which personal information you would like deleted. If we deny your request for the deletion of personal information, we will explain why.

### Amendments

We may change this Privacy Notice from time to time. We will notify you if we make a significant change to this Privacy Notice, by contacting you through the contact details you have provided to us and by publishing an updated version on our website.

# For any questions or notices, please contact us at:

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