

# Stellafoam Privacy Statement

## 1. Introduction

This Privacy Statement 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 Stellafoam 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 Statement 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.

For simplicity throughout this notice, 'we' and 'us' means Stellafoam, the data controller.

## 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 updates and marketing.*

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 place an order with us, we'll collect your address details to deliver your purchase, and pass them to our drivers or courier partners (if that option has been chosen).*

### Legal compliance

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

*For example, invoicing purposes for VAT.*

### 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 may use your address details to send you direct marketing information by post, telling you about price increase updates and brochures that we think might interest you.*

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

### **3. When do we collect your personal data?**

- When you apply for a credit or cash on delivery or door ordering account.
- When you visit our website, and use your account to buy products.
- When you purchase products without an account in store, over the phone or via email.
- When you wish to hire our saw or drilling press.
- When you contact us by any means with queries, complaints etc.
- When you apply for a job either directly or through a job seeking platform.
- We collect data from publicly available sources (such as directories and trade webpages).
- When you use our car park and visit our premises which have CCTV systems operated for the security of both customers and staff. These systems may record your image during your visit.

### **4. What sort of personal data do we collect?**

- If you make a purchase with us: your name, billing/delivery address, orders and receipts, email and telephone number.
- If you have a web account with us we will also we'll also keep an encrypted record of your login password, for your security.
- Details of your interactions with us through in store, online, over the phone and via email.

*For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made.*

- Copies of documents you provide to prove your address (if you are a sole trader and trading from your home address) which will include details of your full name and address.
- Copies of documents you provide to prove your valid Public Liability insurance, which will include details of your full name, address and policy number.
- Details of your visits to our websites and which site you came from to ours.
- Information gathered by the use of cookies in your web browser.
- Your image may be recorded on CCTV when you visit us in store.

### **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 what products you are interested in by combining the data we have about you.

We may 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 website, in store, over the phone or via email. If we don't collect your personal data, we may not 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 deliver the product 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 process your saw or drilling press hire request. We need to collect your personal data to complete the necessary induction form. This includes verifying that you have valid Public Liability insurance, ensuring compliance with safety and legal requirements.
- 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 staff from crime, we operate CCTV systems in store and in our car park which record images for security. We do this on the basis of our legitimate business interests.
- 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 and telephone** about relevant products and services including tailored special offers, discounts, promotions, events 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, product recall notices, 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 display the most interesting content to you on our websites, we'll use data we hold about your favourite products and so on. We do so on the basis of your consent for our website to place cookies or similar technology on your device.

*For example, we might display a list of items you've recently looked at, or offer you recommendations based on your purchase history and any other data you've shared with us.*

- To comply with our contractual or legal obligations to share data with law enforcement.

*For example, when a court order is submitted to share data with law enforcement agencies or a court of law.*

- 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.

- Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers). We do so to fulfil your order. Without sharing your personal data, we'd be unable to fulfil your request.

## **6. 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 website using 'https' technology.
- When data is stored on paper, it is kept in a secure place where unauthorised people cannot see it.
- When data is stored electronically it is protected by strong passwords.
- If data is stored on removable media (like a CD or DVD), these are kept locked away securely when not being used.
- All servers and computers containing data are protected by approved security software and a firewall.

## 7. 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 be deleted completely.

### ***Some examples of customer data retention periods:***

#### ***Orders***

*When you place an order, we'll keep the personal data you give us for six years so we can comply with our legal and contractual obligations.*

#### ***Inactive accounts***

*If you've not used your account for more than six years, it will be flagged as inactive and 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.*

## 8. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

*For example, delivery couriers, for fraud management, to handle complaints 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.

## 9. What are your rights over your personal data?

### **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 unless deemed excessive or manifestly unfounded in which case we will charge a fee of £10.

- 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.

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

***To update or ask for your information please contact The Data Protection Officer, Stellafoam Ltd, Unit 1 Blackwater Close, Fairview Industrial Park, Rainham, Essex, RM13 8UA or email [nicola@stellafoam.co.uk](mailto:nicola@stellafoam.co.uk).***

If we choose not to action your request we will explain to you the reasons for our refusal. The data controller will aim to provide the relevant data within 14 days.

### **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.

## **10. 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.
- Write to **Stellafoam Ltd, Unit 1 Blackwater Close, Fairview Industrial Park, Rainham, Essex, RM13 8UA** or email **[nicola@stellafoam.co.uk](mailto:nicola@stellafoam.co.uk)**.

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

## 11. 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](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

## 12. Any questions?

We hope this Privacy Statement 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: [nicola@stellafoam.co.uk](mailto:nicola@stellafoam.co.uk).
- Or write to us at:

***Stellafoam Ltd,***

***Unit 1 Blackwater Close,***

***Fairview Industrial Park,***

***Rainham,***

***Essex,***

***RM13 8UA***

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