

## **Spindrift Limited's ("Spindrift Sprayers") Privacy Policy**

Spindrift Limited ("We") are committed to protecting and respecting your privacy.

This Policy sets out the basis on which we collect personal data from you and the way in which it will be processed by us. Please read this Policy carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of the relevant data protection legislation, the "controller" (or "data controller") is Spindrift Limited of Unit 6, Leachfield Industrial Estate, Green Lane West, Garstang, Preston, Lancashire, PR3 1PR. Registration number 02508782.

Questions, comments and requests regarding this Policy are welcomed and should be addressed to [sales@spindriftingsprayers.co.uk](mailto:sales@spindriftingsprayers.co.uk).

We collect different types of information about you for the following reasons:

1. To provide goods or services to you, either at your request or in order to fulfil an existing contract;
2. For our legitimate interests, namely in order to help us monitor or improve the products or services we offer, unless any of those legitimate interests are overridden by any of your interests or fundamental rights and freedoms.

### **WHEN DO WE COLLECT INFORMATION**

We collect information on you:

- when you place an order with us or sign up for a trading account;
- when you request a catalogue from us;
- when you use our website, <https://www.spindriftingsprayers.co.uk/> ("our site"), and through the use of cookies
- when we speak to you over the phone during the ordering process or in the process of managing your account.

### **TYPES OF PERSONAL DATA WE COLLECT**

The minimum information we need from you so that you can place an order is your full business trading title, a contact name, address, telephone number and email address. If we are opening a trading account for you, we will ask for details of an account contact and also two trade references acceptable to us. Failure to provide the above minimum information may lead to us being unable to fulfil your order or opening your trading account.

In processing your order (or opening a trading account), we may use your data in the following ways:

- to provide you with our products and services, which includes managing, processing and despatching your orders as well as processing payments for your orders;
- to manage your customer or credit accounts and to keep adequate records of your past purchases;

- to contact you regarding your order, or if we change the way that our products or services work;
- to email you about other products and services we think may be of interest to you based on your previous purchases and enquiries (if you have given us your permission to do so); and
- to send you our catalogue or Product Updates newsletter (if you have given us your permission to do so).

In order to personalise and improve the quality of our services, when you place an order we may also ask you about the nature of your business and how you found us so that we can gain a clearer understanding of who you are. However, you do not need to provide this information in order for us to fulfil your order or open a trading account.

We may need to collect further information in order to provide you with products or services that you have asked for, such as your e-mail address if this has not already been provided to us.

### **COMPUTER INFORMATION**

We also collect technical information about you when you visit our site in order to help us monitor or improve the products or services we offer. This information includes the IP address of the computer used to connect to our site, browser type and version, time zone setting, operating system and platform. We will also collect information about your visit to our site, including the full URL used to access our site, the clickstream to and from our site, (including the date and time), products which you have viewed or searched for, page response times, any download errors, how long you have visited certain pages, page interaction information including scrolling, click and mouse overs and any methods used to browse away from our site. This helps us to monitor and improve on the products and services we provide. In doing so, we may use your data in the following ways:

- to improve our site so that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our site safe and secure;
- for troubleshooting, data analysis, testing, research, statistical and survey purposes; and

Our website uses cookies distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

If we need to process your personal data for a reason which is not outlined above, we shall contact you in order to obtain your prior consent for such use.

### **WHEN WILL WE SHARE YOUR PERSONAL DATA?**

Your information may, for the purposes set out in this Privacy Policy, be disclosed for processing to our employees only.

We will not share your personal data with any third parties for marketing purposes without your express consent. We will however, share your personal data with the following parties ("Third Parties"), for the following reasons:

- Selected third parties, such as our payment and delivery providers, suppliers and subcontractors, where it is necessary to do so in order to provide you with goods that you have ordered, including Barclaycard, Pay Zone, APC and Parcel Force

We reserve the right to disclose or share your personal data in order to comply with any legal requirements, enforce our terms and conditions, or any other agreement we enter into with you, or to protect the rights, property, or safety of our business and other customers. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **WHERE WILL WE STORE YOUR PERSONAL DATA?**

All personal data that you provide to us is stored on our secure servers. We use our best endeavours to ensure that your data is treated securely and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict safeguarding procedures and security features to try to prevent any unauthorised access to your personal data.

### **HOW LONG WILL WE KEEP HOLD OF YOUR PERSONAL DATA**

How long we store your personal information depends upon the type of information we are holding and the purpose for which we need it.

We will keep your data for the period of time you hold an account with us, to enable us to contact you, keep a record of your past orders and supply you with any new orders. We will not keep your personal information for any longer than necessary to fulfil our obligations to you or to meet our legitimate business interests or legal requirements.

Where you have given us your permission to contact you for marketing purposes, including to receive our catalogue or Product Updates newsletter, we will contact you every five years from the date on which you originally gave your permission to ensure that you still wish to be contacted in this way.

### **YOUR RIGHTS**

You have the following rights:

- 1.to request that we provide you with a copy of the information we hold about you ("Access Request");
- 2.to request that we rectify any information we hold about you ("Right to Rectification");
- 3.to request that we erase any information we hold about you ("Right to be Forgotten");
- 4.to restrict the level of processing we carry out with your information ("Restriction of Processing");

- 5.to obtain from us all personal data we hold about you in a structured, machine readable form, and have this information transmitted to another organisation ("Data Portability");
- 6.to object to our processing your information in certain ways ("Right to Object"); and
- 7.to withdraw your consent at any time to our processing of your data.

Please see the relevant sections below for further details on your rights as a data subject. You can exercise any of the above rights by emailing us at sales@spindriftpayers.co.uk. You also have the right to lodge a complaint with the Information Commissioners Office if you are unhappy in any way with how we treat your personal information.

We will comply with any request made under this section as soon as possible, and normally within one month from the date of your request. However, if necessary, for example if your request is particularly complex or we receive a number of similar requests, we may extend this period by an additional two months, but we will notify you if we need to do this.

Please note that where we receive requests under this section which are manifestly unfounded or excessive, in particular because of their repetitive character, we may:

- 1.charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
- 2.refuse to act on the request.

## **ACCESS REQUEST**

You have the right to request a copy of the information that we hold about you at any time. Please note that in most circumstances, we will not make a charge for this, however we may make a reasonable fee based on administrative costs for any further copies requested.

## **RIGHT TO RECTIFICATION**

You have the right at any time to ask us to rectify any personal data that we hold for you which is incorrect or incomplete.

If we have disclosed any incorrect or incomplete data to any third parties, we shall inform them of any necessary amendments or corrections made to your personal data under this section.

## **RIGHT TO BE FORGOTTEN**

You have the right to ask us to erase the personal data we hold about you in circumstances where:

- 1.it is no longer necessary for us to handle your personal data for the purpose for which it was originally collected;
- 2.you have withdrawn your permission for us to hold your personal data (where this was the basis on which it was collected or used);
- 3.you object to the processing of the data and there is no lawful overriding reason for us to continue processing your personal data;

- 4.the personal data was unlawfully processed; or
- 5.we have to erase your personal data in order to comply with a legal obligation.

## **RESTRICTION OF PROCESSING**

You can ask us to restrict how we use your data in the following circumstances:

- 1.where you believe that the information we hold about you is inaccurate, you can ask that we refrain from using your data until we can verify the accuracy of it;
- 2.where we have unlawfully processed your data, you can ask that we restrict our usage of it rather than erase it completely; or
- 3.where we no longer need to hold your information, but you wish us to retain your information for the purpose of establishing, exercising or defending a legal claim.

## **DATA PORTABILITY**

You have the right to obtain from us all personal data which you have provided to us in a structured, commonly used and machine readable form, provided that such data was processed based on your consent, or for the purpose of a contract between us and the processing was carried out by automated means.

This will allow you to move, copy or transfer personal data easily from one IT environment to another. Alternatively, we can transmit such data directly to another organisation.

Please note that we will not be able to comply with a data portability request if this will affect the rights and freedoms of others.

## **RIGHT TO OBJECT**

You have the right to object, on grounds relating to your particular situation, to our processing of your personal data where we are doing this for the performance of a task carried out in the public interest (which we will have told you about, if applicable), or where we are carrying out processing for the purposes of legitimate interests pursued by us.

You also have the right at any time to ask us not to process your personal data for direct marketing or profiling purposes (to the extent that such profiling is related to such direct marketing). We will have informed you before the time we obtained your personal data whether we intend to process your personal data for this purpose, or if we intend to disclose your information to any third party for such purposes.

If we process your personal data for automatic decision making or profiling purposes (i.e. to analyse or predict your personal preferences and purchase behaviour, and such profiling is automated) we will ensure that we tell you about this beforehand, and will only do this where this is a necessary condition of entering into a contract between you and us, or where you have given us your explicit consent to do this.

### **THIRD PARTY WEBSITES**

Our site may contain links to our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for them. We advise you to check these policies before you submit any personal data to these websites.