



# UNIVERSAL TRADE FRAMES LTD

## PRIVACY POLICY

### May 2018

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulations (GDPR), which applies across the European Union (including the United Kingdom) and for the purposes of the GDPR and UK data protection laws, we are responsible as the controller of that personal information.

#### **About this document**

This privacy policy sets out the way we collect, store, use and share personal information and in doing so, how we comply with our legal obligations to you. It also explains your rights in relation to your personal information and how to contact us, or supervisory authorities, in the event that you have a complaint.

Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This privacy policy applies to our customers, suppliers, staff emergency contacts, and our website users. A staff privacy policy is available for all members of staff.

#### **Key Terms**

<b>We, us, our</b>	<b>Universal Trade Frames Ltd of Yeomanry Road, Battlefield Enterprise Park, Shrewsbury SY1 3EH</b>
<b>Personal information</b>	<b>Any information relating to an identified or identifiable individual</b>

## How we collect your information

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you make enquiries on our website, by email, fax or telephone
- From marketing agencies i.e. Insight Data Ltd
- From publicly accessible sources e.g. Companies House
- From a third party such as organisation we have a direct relationship with and you have confirmed with that organisation that you are happy for your personal data to be shared e.g. credit reference agencies
- From staff – where your details are provided as an emergency contact.

## The types of information we collect

We may collect the following types of personal data about you:

- Your name and contact information including email address and telephone number and company details
- Information to enable us to check and verify your identity e.g. your date of birth.
- Your location data, if you chose to give this to us
- Your billing information, transaction and payment card information
- Your contact history, purchase history and saved items
- Information from accounts you link to us e.g. Facebook
- Information to enable us to undertake credit or other financial checks on you
- Your responses to surveys, competitions and promotions

This personal information is required to provide products and services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing products and services to you.

## How and why we use personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so. We will use personal information for the following purposes:

- To comply with our legal and regulatory obligations
- Processing and fulfilment of orders for our products
- Ensuring that the contractual arrangements between us can be implemented so that the relationship can run smoothly
- Obtaining trade/bank references
- After sales and guarantee purposes
- To keep you informed of new products and industry developments
- To comply with health and safety legislation
- Where you have provided consent

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products and services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or us	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity	To comply with our legal and regulatory obligations
Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our insurance provider	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and health and safety	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party i.e. to protect trade secrets and other commercially valuable information
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product/service range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price

What we use your personal information for	Our reasons
Updating and enhancing customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> <li>—existing and former customers;</li> <li>—third parties who have previously expressed an interest in our services;</li> <li>—third parties with whom we have had no previous dealings.</li> </ul>	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

## Promotional Communication

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see How and why we use your personal information). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to opt out of receiving promotional communications at any time by:

contacting us at: [info@utfl.co.uk](mailto:info@utfl.co.uk) or telephoning 01743 442244

using the 'unsubscribe' link in emails/newsletters

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

## Who we share your personal information with

We do not routinely share your personal information. We would only do so if we have a legitimate business reason to do so, this may include:

- third parties we use to help deliver our products and services to you, e.g. insurance providers, delivery companies, contractors and payment service providers
- other third parties we use to help us run our business; e.g. marketing agencies or website hosts
- third parties approved by you, e.g. social media sites you choose to link your account to
- external auditors
- our insurers and brokers
- credit reference agencies
- our banks

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

## **Keeping and safeguarding your personal information**

We care about protecting your information. We have appropriate security measures to prevent personal information from being accidentally lost, used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We do not share or sell your personal information externally, unless it such action complies with the terms of this privacy policy or we have your explicit consent to do so.

Internally your personal information is stored on secure servers that are housed in controlled environments to protect against loss, misuse or alteration of your information. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **How long your personal information will be kept**

We do not keep your personal information for longer than is necessary for the purposes set out in this policy. We will keep your personal information while you have an account with us or to enable us to fulfil our obligations to you under our contractual terms. Thereafter, we will keep your personal information for as long as it is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf
- To show that we treated you fairly
- To keep records required by law

Different retention periods apply for different types of personal information for example, electronic personal information regarding supply of goods will be kept for 10 years i.e. the period for which our products are guaranteed.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

## **Your rights**

Under certain circumstances, by law, you have the right:

- To request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- To request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- To request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- To object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- To request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your information (without affecting the lawfulness of our previous processing based on consent).
- To request to receive the personal information you provided to us in a structured, commonly used and machine-readable format and request the transfer of your personal information to another party.
- Not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

## Contact and complaints

If you have any queries about this privacy policy or how we process your personal information, or if you wish to exercise any of your legal rights, you may contact Universal Trade Frames Ltd:

- by email: [info@utfl.co.uk](mailto:info@utfl.co.uk)
- by telephone: 01743 442244
- or by post: Universal Trade Frames Ltd, Unit 4.2A Yeomanry Road, Battlefield Enterprise Park, Shrewsbury, Shropshire, SY1 3EH

Please let us have enough information to enable us to identify you (e.g. your full name and address), let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility bill or credit card bill and let us know why you are contacting us.

If you are not satisfied with how we are processing your personal information, you can make a complaint to the Information Commissioner. You can find out more about your rights under applicable data protection laws from the Information Commissioner's Office website: [www.ico.org.uk](http://www.ico.org.uk).