

# ROXOR

## Privacy Notice – your Personal Data

Roxor Group Ltd ('Roxor') respects your privacy and is committed to protecting your personal data.

This website is not intended for children and we do not knowingly collect data relating to children.

Roxor has appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions, please contact us, using the details below.

### Contact details

Roxor Group Ltd

Company Registration Number: **10446715**

Email address: **Mike.Duggleby@roxorgroup.com**

Postal address: **Hamnett House, Gibbett Street, Halifax, West Yorkshire, HX2 0AX**

Telephone number: **01422 417110**

### The Point of this Notice?

This privacy notice will let you know how we look after your personal data when you visit our website and/or otherwise engage with Roxor, it also provides an explanation of your privacy rights and how the law protects you.

### What Personal Data?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We are a manufacturer and supplier to trade and as a result rarely engage with personal information for end customers, our engagement is generally limited to occasional delivery engagement, to assist in identifying stockists of our products, to address general enquiries and also to address warranty related issues.

Roxor collects and processes personal data through visitors use of this website, and individuals wider engagement with us, including when you get in touch with us using a web form, sign up to receive a newsletter or when you contact us about our products (over the phone or in person) so we can provide services to you, and in performing those services.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity & Contact Data** includes first name, last name, username or similar identifier, title, address, email address and phone numbers.
- **Financial & Transaction Data** includes bank account and payment card details, payment details to and from you.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us, your communication preferences and use of this website.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- We do not collect any sensitive or Special Category Personal Data about you.

# ROXOR

## How we use your personal data

We use personal data in the following circumstances:

- Where we need it to perform or support the performance of a contract to supply our products, entered into with you or one of our stockists.
- Where we need to comply with a legal or regulatory obligation, specifically relating to financial record keeping.
- We do not rely on consent as a legal basis for processing your personal data.

## Purposes for which we will use your personal data

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.

Purpose / Activity	Type of Data	Basis for Processing
<b>1.</b> Gathering information necessary to allow us to identify you and communicate with you via web enquiry, email or phone enquiry. <b>2.</b> Engaging with your enquiry in respect of stockists, products, delivery (where we are delivering directly) or warranty related issues.	<b>(a)</b> Identity & Contact <b>(b)</b> Financial & Transactional	<b>(a)</b> Performance of a contract/ contractual right or obligation (for example delivery or warranty related) with you. <b>(b)</b> Necessary to comply with a legal obligation including VAT and financial record keeping. <b>(c)</b> Our legitimate interest in generating sales of our products and assisting clients for example by assisting you to locate stockists.
<b>3.</b> Manage warranty and repair issues, including payments, fees and charges (limited to additional charges around repair and limited outside of warranty engagement).	<b>(a)</b> Identity & Contact <b>(b)</b> Financial & Transactional	<b>(a)</b> Performance of a contract with you and recovery of payment. <b>(b)</b> Necessary to comply with a legal obligation including VAT and financial record keeping. <b>(c)</b> Our legitimate interest in maintaining customer engagement and ensuring product support and assisting end purchasers.
Purpose / Activity	Type of Data	Basis for Processing

# ROXOR

<p>4. Managing our relationship with potential trade clients and end customers who may want to know more about our products and service:</p> <p><b>(a)</b> Providing newsletters, brochures and other product and stockist information;</p> <p><b>(b)</b> Notifying you about changes to our terms or privacy policy; <b>(c)</b> engaging with client feedback related issues.</p>	<p><b>(a)</b> Identity &amp; Contact <b>(b)</b> Marketing &amp; Communications</p>	<p><b>(a)</b> Performance of a contract with you. <b>(b)</b> Necessary for our legitimate interests (to provide direct marketing and legitimate interest in keeping our records updated and to study how customers use our products/services).</p>
<p>5. To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p><b>(a)</b> Identity &amp; Contact <b>(b)</b> Technical</p>	<p><b>(a)</b> Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). <b>(b)</b> Necessary to comply with a legal obligation.</p>
<p>6. To deliver relevant website content and advertisements and measure or understand the effectiveness of the advertising we provide.</p>	<p><b>(a)</b> Identity &amp; Contact <b>(b)</b> Marketing &amp; Communications <b>(c)</b> Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).</p>
<p>7. To use data analytics to improve our website, products, marketing, customer relationships and experiences.</p>	<p><b>(a)</b> Technical <b>(b)</b> Marketing &amp; Communications</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>8. To make suggestions and our recommendations to you about goods or services that may be of interest to you.</p>	<p><b>(a)</b> Identity &amp; Contact <b>(b)</b> Marketing &amp; Communications <b>(c)</b> Technical</p>	<p><b>(a)</b> Performance of a contract with you. <b>(b)</b> Necessary for our legitimate interests (as we develop our products/services and to grow our business).</p>

## Marketing

Our communication about the delivery of services or warranty enquiry is separate to any marketing we might undertake.

You may receive marketing communications from us if you have specifically consented to receive it or requested information from us or purchased goods or services from us and, you have not opted out of receiving that marketing. As an individual, you can unsubscribe at any time from our use of your personal data for marketing and advertising communication by contacting us [Mike.Duggleby@roxorgroup.com](mailto:Mike.Duggleby@roxorgroup.com) or by using the unsubscribe link which is in any e-mail marketing communication we provide.

# ROXOR

## **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. We will ensure that any such request is entirely clear and easy to understand, providing you with control of your personal data use.

## **Third-party links**

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## **Disclosures of your personal data**

### **We may share personal information with the following organisations**

- Stockists where you ask us to pass on an enquiry, usually we will provide you their details, so you can make direct contact.
- Service providers acting as processors for us based in the UK who provide IT and system administration and business support services to us.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require us by law to maintain and report information to them.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will update this list from time to time.

## **International transfers**

We do not transfer your personal data outside the United Kingdom and the European Economic Area (EEA).

If we were to use a third-party based outside of the United Kingdom or EEA where their processing of personal data may involve a transfer of data outside of the United Kingdom and EEA, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

# ROXOR

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK, or where the service provider has entered a specific scheme to ensure personal data is safeguarded – for example the US Privacy Shield Scheme.

## Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 and the purposes for which we process your personal data.

By law we have to keep basic information about transactions with customers (including Some Contact and Identity & Financial and Transaction Data) for six years after they cease being customers for tax purposes. Otherwise the Personal Information we gather related to provision of products is usually kept for 3 years or less, so we can manage queries you may have and for warranty related & record keeping reasons, we only retain information required to manage queries which might arise.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights. If you wish to exercise any of these rights, please contact us Mike Duggleby@roxorgroup.com, 01422 417110, Hamnett House, Gibbett Street, Halifax, West Yorkshire, HX2 0AX.

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month, for example if your request is particularly complex or you have made a number of requests. In this

# ROXOR

case, we will notify you within a month of your complaint, keep you updated and respond in no more than two further months.

## **You have the right to:**

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. 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.

## **Right to Complain**

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, be happy to consider and assist you with any concern you may have so would be delighted if you might contact our data privacy manager in the first instance: [mike.duggleby@roxorgroup.com](mailto:mike.duggleby@roxorgroup.com) – **01422 417000**.

**Version 2: August 2018**