Privacy Policy

Welcome to Clayton Glass Group Limited's privacy policy.

Clayton Glass Limited respects your privacy and is committed to protecting your personal data.

www.claytonglass.co.uk is the website of Clayton Glass Group Limited (Company No. 15341534) registered in England & Wales with a registered office at Clayton Glass Group Ltd, Orchard Court, Huthwaite, Nottinghamshire, NG17 2HU. Any reference in this policy to "we", "us" or "our" is to Clayton Glass Group Limited.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data, including any data you may provide when purchasing our products and services, when filling in forms on our website or when providing feedback to us.

Our products and services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing notices we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

For the purposes of the Data Protection Act 2018 and, to the extent that it applies in the UK, the General Data Protection Regulation or "GDPR" (and all other laws relating to the use of your personal data), we are the "data controller", meaning that we are responsible for deciding how your personal data is used and more importantly, for keeping your data safe and only using it for legitimate reasons.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: Clayton Glass Group Limited

Email address: tom.moore@claytonglass.co.uk

Postal address: Clayton Glass Group Ltd, Orchard Court, Huthwaite, Nottinghamshire, NG17 2HU.

Telephone number: 01207288200

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.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. If we amend our privacy policy it will be published on www.claytonglass.co.uk so please check back regularly to see if there have been any updates. If we make any substantial changes, we may also email you if it's appropriate.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. THE DATA WE COLLECT ABOUT YOU

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

- **Identity Data** includes first name, last name, title and CCTV images.
- **Contact Data** includes email address and telephone numbers and (occasionally) your home address.
- **Transaction Data** includes details about payments to and from you.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us andyour communication preferences.
- **Voice Data** includes recordings of telephone calls you may make to us.

We may collect the following types of information from you when you use our website (using cookies or other tracking technology):

- **Usage Data** includes information about how you use our website, products and services.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone settingand location, browser plug-in types and versions, operating system and platform, and othertechnology on the devices you use to access this website.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this 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). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Voice Data by filling in forms on ourwebsite or by corresponding with us by post, phone, email or otherwise. This includes personal datayou provide when you purchase our products and services, request marketing to be sent to you orgive us feedback or contact us.
- **Third parties or publicly available sources.** We may receive personal data about you from variousthird parties and public sources. This includes for example Technical Data from analytics providerssuch as Google.
- **Automated technologies or interactions.** As you interact with our website, we may automaticallycollect Technical Data about your equipment, browsing actions and patterns. We collect thispersonal data by using cookies, and other similar technologies.
- **CCTV.** We use CCTV to protect our sites, which may capture images of you.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests andfundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please see the Glossary at clause 10 below to find out more about the types of lawful basis that we will rely on to process 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. 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 contact us if you need 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/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a)Identity (b)Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees andcharges (b)Collect and recover moneyowed to us	(a)Identity (b)Contact (c)Transaction (d)Voice	(a)Performance of a contract with you (b)Necessary for our legitimate interests(to recover debts due to us)
To provide you with information you have requested from us (e.g. through our website enquiry form), respond to enquiries or requests from you, and communicate with you in relation to those enquiries or requests	(a)Identity (b)Contact (c)Marketing and Communications (d)Transaction (e)Voice	(a)Necessary for our legitimate interests(to ensure our customers are informedand satisfied with our services and tohandle enquiries to our business)
To manage our relationship with you which will include: (a)Notifying you about changes to our terms or privacy policy (b)Asking you to leave a review or take a survey	(a)Identity (b)Contact (c)Marketing and Communications (d)Voice	(a)Performance of a contract with you (b)Necessary to comply with a legalobligation (c)Necessary for our legitimate interests (to keep our records updated and to studyhow customers use our products/services)
To administer and protect our business (including our premises) and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a)Identity (b)Contact (c)Technical (d)Usage (e) Voice	(a)Necessary for our legitimate interests (for running our business, provision ofadministration and IT services, networksecurity, premises security (CCTV), toprevent fraud and in the context of abusiness reorganisation or group restructuring exercise) (b)Necessary to comply with a legalobligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a)Technical (b)Marketing and Communications (c) Usage	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)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a)Identity (b)Contact (c)Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We may use your Identity, Contact and Marketing and Communications Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing, or if we consider that marketing communications may be of use to you.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by writing to us at tom.moore@claytonglass.co.uk or by calling us on 01207288200. Where you opt out of receiving these marketing messages, this will not apply to personal data that we process and use on a different lawful basis, or in respect of which you continue to consent to us processing.

Cookies

We use cookies on our website, which may collect personal data. View our separate Cookie Policy on our website to provide more information about the cookies we use. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Our Website - Third-party links

Our website 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 notice 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Suppliers

If you are a supplier to us, you may be asked to supply certain personal data to us and we will process that personal data for the purposes of the contract that you and we enter into for the supply of your products/services, and we may retain that data in accordance with this policy (and pursuant to the legitimate interests of both you and us) so that we may purchase your products/services again in future.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Service providers (acting as processors) such as providers of IT, payroll and system administration/support, CCTV, telephone and marketing services (including Sage, Glass Office, Microsoft Office 365, Google Drive).
- Professional advisers (acting as controllers) including bankers, lawyers, auditors, accountants and insurers who provide banking, consultancy, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities (acting as controllers) who may require reporting of processing activities in certain circumstances.
- 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 policy.

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 where they act for us as processors of data, and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Most of the personal data we hold is held by us in the UK. However there may be occasions when we need to transfer or process data outside of the UK. We may do this only pursuant to a specific legal basis. Any such data transfer is usually based on one of the legal bases described below, however you can inquire with us to learn more and in particular which legal basis applies to which specific service, through the contact details provided in this policy.

Data transfer based on standard contractual clauses

If this is the legal basis, the transfer of personal data from the UK to other countries is carried out according to standard contractual clauses made or approved under the Data Protection Act 2018. This means that data recipients have committed to process personal data in compliance with the data protection standards set forth by UK data protection legislation.

Data transfer to countries that guarantee appropriate data protection standards

If this is the legal basis, the transfer of personal data is carried out according to adequacy regulations made under the Data Protection Act 2018. These adequacy regulations are issued in respect of specific countries that provide personal data protection standards comparable to those in UK data protection legislation.

7. 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.

8. DATA RETENTION

How long will you use my personal data for?

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.

By law we have to keep basic information about our customers for six years after they cease being customers for tax purposes.

We keep personal data relating to our suppliers for longer, as it is in both our interests and theirs that they remain on our system and potentially available for work from us.

CCTV footage will be retained for up to four months on the basis that it provides short term security for our premises.

In some circumstances you can ask us to delete your data: see clause 10 below for further information.

In some circumstances we will 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.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data and you are entitled to:

- Access a copy of your personal data.
- Correct or update your personal data.
- Erase your personal data.
- Object to the processing of your personal data where we are relying on a legitimate interest (as set out in the above table).
- Restrict the processing of your personal data.
- Request the transfer of your personal data to a third party.
- Where you have provided your consent to certain of our processing activities, in certain circumstances, you may withdraw your consent at any time (but please note that we may continue to process such personal data if we have legitimate legal grounds for doing so).

If you want to exercise any of these rights, please contact us.

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 could 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 could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Your legal rights

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:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - 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.
  - 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.