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## PRIVACY NOTICE & COOKIES POLICY

**DATE: 30 JUNE 2023**

### INTRODUCTION & WHO WE ARE

We are PJB Glass Group Limited, a company registered in the UK with company registration number 05717094 (referred to as "we", "us" or "our").

This privacy notice sets out how we use and protect any personal data that we collect when you use our website, liaise with us in relation to purchasing our goods or otherwise deal with us. For the purposes of data protection laws, we are the controller which means that we are responsible for your personal data. As such, we respect your privacy and are committed to protecting your personal data.

This privacy notice gives you information on why and how we collect your personal data, what we do with it, what rights you have and how to exercise them.

We keep our privacy notice under regular review. This version was last updated on the date shown at the top of this page.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your personal data.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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### 1. HOW TO CONTACT US

If you have any questions about this privacy notice or our privacy practices, including any requests to exercise [your legal rights](#), please contact us using the details below:

PJB Glass Group Limited

Email address: [steven.hunter@pjbglassgroup.com](mailto:steven.hunter@pjbglassgroup.com)

Postal address: Unit C/D Cronin Road, Weldon South Industrial Estate, Corby, Northamptonshire, NN18 8AQ

Telephone number: 07703752726

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](http://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.

## 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).

The data we collect usually relates to your company or the company you are employed by. However, if you are a sole trader, director or where we otherwise liaise with you directly on behalf of your company or employer, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** - first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- **Contact Data** - billing address, delivery address, email address and telephone numbers;
- **Financial Data** - financial references, bank account and payment details.
- **Transaction Data** - details about payments and other details of goods purchased from us;
- **Technical Data** - 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 our website;
- **Communications Data** - your communication preferences.

### ***Aggregated data***

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 transaction data to calculate the percentage of sales in a particular region. 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 notice.

### ***Special categories of personal data***

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). 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.

### ***Accurate data***

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.

## 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 personal data relating to your identity or contact details or financial data when corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - request information about our goods such as a quotation;
  - place an order for our goods;

- request a credit account for the purchase of our goods;
  - complete any forms we provide you with;
  - request marketing to be sent to you;
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies[, server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see [cookies](#) for further details.
  - **Other sources.** We will collect personal data about you from other sources as set out below:
    - Identity and Contact Data from publicly available sources such as Companies House, the Register of Judgments and the Electoral Register.
    - Using our third party service providers who conduct financial checks on our customers on our behalf.

#### 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 (for example, for the supply of goods);
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal obligation;
- where we have obtained your consent (for example, for any marketing you sign up to or request and please note that you have the right to withdraw consent to marketing at any time by contacting us).

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 (using the groups we identified above in <i>the data we collect about you</i> )	Lawful basis for processing including basis of legitimate interest
To register your company as a new customer on our systems	(a) Identity (b) Contact (c) Financial	Performance of a contract

<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Deliver the goods</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Communications</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Notifying you about changes to our standard terms and conditions of sale</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Communications</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) 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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, products/ services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</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>

### **Third-party marketing**

We do not share your personal data with any third parties for marketing purposes.

### **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.

## **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:

- Other companies who may be subsidiaries or any holding company who we may have shared IT and system administration services with.
- Our third party service providers based in the UK who provide services to our business such as hosting, software, transport and other IT or administrative services.

- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services to us.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Fraud prevention agencies and third parties who provide us with financial check services.
- 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.

### ***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.

## **6. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside of the UK.

## **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**

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

In some circumstances you can ask us to delete your data: see [your legal rights](#) 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. 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, 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.

### **COOKIES**

Our website uses cookies to 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.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

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.

We use the following categories of cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website.

#### **Third parties**

We do not share the information collected by the cookies with any third parties.