

1 About this policy

- 1.1 This policy explains when and why we collect personal information about our customers. It explains how we use it and how we keep it secure, and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as detailed when we collect data from you.
- 1.3 We reserve the right to amend this policy from time to time without prior notice. You are advised to check our website (www.geospence.co.uk) for any updates.
- 1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal and company data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of GDPR we will be the 'controller' of all personal and company data we hold about you.
- 1.5 All enquiries about this policy are to be directed to the Data Controller at Geo. Spence & Sons Ltd via sales@geospence.co.uk

2 Who are we?

- 2.1 We are Geo. Spence & Sons Ltd. Our registered business address is 105 Wellington Road, Leeds, LS12 1DX. We can be contacted via sales@geospence.co.uk or 0113 2790507.

3 What information we collect and why

Type of Information	Purposes	Legal Basis for Processing
Account Customers: Name, address, telephone number and email address, website address, Accounts department information. Names of key contacts and authorised signatory, names & addresses of 2 business references.	Managing the Customer's account with the business. Communicating with the customer	Performing the business's contract with the account customer.
Customers Placing Special Orders: Name, Address, Telephone number and email address.	Managing the Customer's order with the business. Communicating with the customer.	Performing the business's contract with the customer.
Customer Enquiries: Name, Address, Telephone number and email address.	Managing the Customer's enquiry with the business. Communicating with the customer.	Performing the business's contract with the customer.
CCTV images of all customers who visit the business premises and retaining the images for a period of 30 days.	For recording and reporting any incidents of crime in the premises.	Preventing crime and seeking prosecution where applicable.
Registration of Products (Power Tools): Name, Address, Telephone and email address.	Managing the Customer's Product Warranty Account with the customer & manufacturer. Communicating with the customer	Performing the business's contract with the customer. Performing the business's contract with the product tool manufacturer. In this case, the product manufacturer is the data controller and Geo. Spence & Sons Ltd is the data processor.
Product Repairs: Name, Address, Telephone and email address.	Managing the Customer's product repair with the repair service contractor. Communicating with the customer	Performing the business's contract with the customer. Performing the business's contract with the product repair service contractor.
Photos and videos of customers attending demo days or supplier promotion days at the business premises.	Putting on the business' website and social media pages and using in press releases.	We will seek the Customer's consent in writing prior to using any images on our company website or social media pages or other advertising mediums. The customer may withdraw their consent at any time by contacting the Company's Data Controller by email or letter.

3.1 **How we protect your personal data**

We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorized alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk. We have a clearly defined contract in place with our Data Processor which sets the requirements they are to meet.

- 3.2 Customers are asked to note that where they are transmitting information to the business over the internet this can never be guaranteed to be 100% secure.
- 3.3 For any payments which we take from you online we will use a recognized online secure payment system.
- 3.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

3.5 **Who else has access to the information you provide to us?**

We will never sell your personal data. We will not share your personal data with any 3rd parties without your prior consent (which you are free to withhold) except where to do so by law or as set out in the table above or paragraph 3.7 below.

- 3.6 We may pass your personal data to 3rd parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf. However, we only disclose the personal data which is necessary for the 3rd party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

3.7 **How long do we keep your information?**

Account holders: We will hold your personal and business data on our systems for as long as we are supplying products or services to you as a registered account customer; and retain this information after the account is closed as outlined in the Account Terms & Conditions.

- 3.8 Special Order Customers & Enquiries: We will hold your personal data until the goods are collected and paid for by you and retain this information afterwards as outlined in the Special Order Terms & Conditions.
- 3.9 We will review your data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so we will stop processing your personal data in line with our data retention policy.
- 3.10 We securely destroy all financial information once we have used it and no longer need it.

4 **Your rights**

You have rights under the GDPR:

- 4.1 To access your data
- 4.2 To be provided with information about how your personal data is processed
- 4.3 To have your personal data corrected
- 4.4 To have your personal data erased in certain circumstances
- 4.5 To object to or restrict how your personal data is processed
- 4.6 To have your personal data transferred to yourself or to another business in certain circumstances
- 4.7 You have the right to take any complaints about how we process your personal data to the Information Commissioner <https://ico.org.uk/concerns/>, 0303 123 1113, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
- 4.8 For more details please address any questions, comments and requests to the Company's Data Controller via sales@geospence.co.uk.