

# PRIVACY POLICY

This Website is owned and operated by Stafford & Coomber Limited of 112 Lambrook Road, Taunton Somerset TA1 2AD (hereafter "Company") a company registered in England and Wales. The Company is the data controller and responsible for your personal data.

We take user privacy seriously and take reasonable efforts to protect it. We have created this Privacy Policy (hereafter "Policy") in order to share with you our information collection and use practices. **AS MORE CLEARLY DEFINED HEREIN, WE WILL NEVER KNOWINGLY SELL OR ASSIGN YOUR PERSONAL INFORMATION WITHOUT YOUR KNOWLEDGE AND/OR APPROVAL.** Please read this Policy carefully before sharing any personally identifiable information described below.

This Policy is subject to change at any time and any changes will be alerted to you by email and posted on this page. This Privacy Policy was last updated, and became effective, on 21 May 2018

This Policy works hand-in-hand with the Terms and Conditions found elsewhere on our web site or available on request.

## **What personally identifiable information does the Company collect and how is it used?**

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

When you visit, register or order products or services from us, including on our website we may collect, use, store and transfer certain information about you including:

- **Identity data:** your name, username or similar identifier and title as well as the results of any checks carried out through a credit reference agency to confirm your identity;
- **Contact data:** email address, home, billing or business address;
- **Financial data;** bank account and payment card details;
- **Transaction data:** details about payments to and from you and other details of products and services you have purchased from us.
- **Technical data:** includes internet protocol (IP) address, browser type and version, operating system and platform and other technology on the devices you use to access this website.
- **Usage data:** information about how you use our website and products such as access times; and
- **Marketing and communication data:** includes your preferences in receiving marketing from us and your communication preferences.

Users may provide other information about themselves, in addition to the mandatory personal information (hereafter "Voluntary Information").

## **How is your personal data collected?**

We use different methods to collect data from and about you.

You may give us your identity, contact and financial data by filling in forms or corresponding with us by post, phone or email or otherwise. This includes personal data you provide when you:

- Purchase our products online;
- Register a wish to be contacted/called back;
- Subscribe to our newsletter;
- Request marketing to be sent to you;
- Enter a competition, promotion or survey; or
- Give us some feedback.

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 a 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 and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

We have set out below, in a table format, a description of all the ways we plan to use your personal data and the legal bases we rely on to do so.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
Operation and management the Company web site.	Technical data Usage data	Performance of a contract with you
Enable you to participate in interactive features of our service, when you choose to do so.	Identity data Contact data Technical data Usage data Marketing and communication data	Performance of a contract with you.
Provide products/services that have been requested by you.	Identity data Contact data Transaction data Technical data Usage data Marketing and communication data	Performance of a contract with you.
Respond to other inquires or requests by you.	Identity data Contact data Transaction data Technical data Usage data Marketing and communication data	Performance of a contract with you.
Provide you with information about new products or services that the Company will introduce in the future.	Contact data Transaction data Technical data Usage data Marketing and Communication data	Necessary for our legitimate interests (to develop our products and services and to grow our business).
Our partners and/or vendors in order to fulfil orders from you (for example couriers).	Identity data Contact data Transaction data	Performance of a contract with you.

	Technical data Usage data Marketing and communication data	
Manage payments, fees and charges including collecting and recovering money owed to us.	Identity data Contact data Financial data Transaction data Technical data Usage data Marketing and communication data	Performance of a contract with you and necessary for our legitimate interests (recovery of debts due to us).
Notifying you about changes to our terms or privacy policy	Marketing and communication data Contact data Identity data	Necessary to comply with a legal obligation.
Disclose personally identifiable information in the establishment or exercise of legal rights or defences against legal claims, to comply with applicable laws or regulations, to comply with a valid legal process, such as a search warrant, subpoena or court order or to investigate suspected fraud or a violation of our Terms and Conditions of Use.	Identity data Contact data Financial data Transaction data Technical data Usage data	Necessary for our legitimate interests.
Asking you to take a survey or request that you provide feedback.	Contact data Marketing and communication data	Necessary for our legitimate interests (to study how our customers use our products and to develop and improve our website and service).
Send notices of competitions, special offers, promotions.	Contact data Marketing and communication data	Necessary for our legitimate interests (to develop and grow our business)

We will never sell user information to any 3rd-party not affiliated with the Company, without consent, except in connection with the sale or merger of the Company or the division responsible for such services provided.

The Company may also use such Voluntary Information for marketing its products and services to you unless you have 'opted out' of receiving such marketing information from us. Users may 'opt out' at any time by contacting customer service at [info@staffelec.co.uk](mailto:info@staffelec.co.uk)

When the Company sends or posts surveys and requests for your feedback, any responses we receive from users will be used only to evaluate our web site and services and no personally identifiable information from respondents will be shared with any non-employees of Company, except that information provided in the Feedback/Comments areas which you specifically consent can be shared in those circumstances.

To maintain customer service standards and to assist staff training, we may record and monitor incoming calls.

### **What non-personally identifiable information does the company collect and how is it used?**

We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example we may aggregate usage data to calculate the percentage of users accessing a specific website feature.

The Company may use and disclose non-personally identifiable information for any number of reasons, including but not limited to, working with business partners and improving our web site and services.

### **Newsletters**

The Company may send out a Newsletter via email (hereinafter "Newsletter") to all Users (unless they have 'opted-out'). In these Newsletters, we may inform you about new services and promotions.

Users may choose to unsubscribe from any Newsletter at any time by sending an email to [info@staffelec.co.uk](mailto:info@staffelec.co.uk)

### **Disclosure of your information**

The information you provide to us may be accessed by or given to third parties who act for us for the purposes set out in this policy or for other purposes approved by you. Those parties process information, fulfil and deliver orders, process credit card payments and provide support services on our behalf. We may also pass aggregate information on the usage of our website to third parties but this will not include information that can be used to identify you.

Where you have consented when providing us with your details, we may also allow other companies to contact you occasionally about products and services which may be of interest to you. They may contact you by e-mail. If you change your mind about being contacted by these companies in the future, please let us know at [info@staffelec.co.uk](mailto:info@staffelec.co.uk)

You agree that we may disclose your identity and contact details to (1) any third party who claims to us that any material posted or uploaded by you to our site constitutes a violation of their intellectual property rights or their rights of privacy, and (2) to other companies and organisations for the purposes of fraud protection and credit risk reduction.

Finally, if our business enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

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.

### **Is my information private with company merchants and advertisers?**

The Company web site may contain links to various 3rd-party web sites and the external web sites of 3rd-party partners. Each of these web sites may have a privacy policy that differs from that of the Company. This Policy does not cover the privacy policies of other web sites. We urge you to check the privacy policies of each web site that you may visit or interact with.

The only Voluntary Information that may be shared between the Company and one of our partner web sites is that which pertains to information used in the furtherance of tracking an order and providing you with correct information regarding the same.

Order information, including order numbers and amounts, may be available to the Company, affiliate merchants and 3rd-party affiliate program management companies, for accurate tracking purposes. The Company will not release this information to other parties unless you request it.

The Company may provide banner and advertising on its web site, that may place and read cookies on your browser, or use web beacons to collect information in the course of advertisements being served. If you are concerned about your privacy regarding these advertisements, please refer the third party's privacy policies.

### **Automated technologies using cookies**

Cookies are small text files that a website can write to your computer. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies automatically collect Technical Data about, described above about your browsing actions and patterns. We use cookies to identify you and allow you to log in. Cookies are also used by our affiliates or links to identify you as a User of our website.

Please see our Cookies Policy for detailed information about the types of Cookies which the Company uses and the purposes for their use.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

The Company does not use Cookies to store information such as credit card numbers, telephone numbers, or other information you provide.

This Privacy Policy only covers the use of Cookies by us. It does not cover the use of Cookies by any other 3rd-party or advertisers.

## What about data security?

We employ security measures to protect, so far as reasonably possible, your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

The Company requires its partners to ensure the security of the data that users provide to them, however, in the event of a breach of their security measures, you agree that the Company will not be liable for any losses or damages.

The Company limits access to personal information about users to employees, for whom we reasonably believe it is necessary, in order to provide products or services.

## Data retention

We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. The table below details the maximum length of time we will retain each type of data we use.

<b>Data Type</b>	<b>Maximum period of retention</b>
Identity data	After 2 years of inactivity or on request of removal.
Contact data	6 years (in accordance with HMRC requirements).
Financial data	6 years (in accordance with HMRC requirements).
Transactional data	6 years (in accordance with HMRC requirements).
Technical data	After 2 years of inactivity or on request of removal.
Usage data	After 2 years of inactivity or on request of removal.
Marketing and communication data	After 6 months of inactivity or on request of removal.

## May I see the information the Company collects about me?

You are entitled to see the personal information held about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us at [info@staffelec.co.uk](mailto:info@staffelec.co.uk) You will not have to pay a fee to access your personal data. 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.

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

- Access of your personal data;
- Correction of your personal data;

- Erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing of your personal data;
- Request transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us at the above email address.

### **Can I Opt-out?**

The Company gives users the option to remove personally identifiable information from our list of active users.

You may also choose to opt-out of certain communications from the Company, such as any Newsletter.

If you want to unsubscribe or opt-out of communications from us, send an email to [info@staffelec.co.uk](mailto:info@staffelec.co.uk) or advise us in writing to 112 Lambrook Road, Taunton, TA1 2AD. We will respond within 48 hours.

The Company is not responsible for removing personally identifiable information from the lists of any 3rd-party partner who has previously been provided your information in accordance with this Policy.

### **Where is the web site located?**

The Company web site is maintained in the United Kingdom. If you are located outside of the U.K., by using the web site, you authorise the import of you information and its use, as specified in this Policy.

### **What is the minimum age to use this website?**

Use of our website is intended for persons who are eighteen (18) years or older, or business entities.

### **Spy ware**

The Company never uses or installs spy ware on user computers, nor do we use spy ware to retrieve information from user computers.

### **Section Titles**

The section titles used in this Policy are purely for convenience and carry with them no legal or contractual effect.

### **Contact**

All comments, queries and requests relating to our use of your information are welcomed and should be addressed to [info@staffelec.co.uk](mailto:info@staffelec.co.uk)