

# Bells Sheet Metal Ltd

## PRIVACY POLICY

### Introduction

Welcome to the Bells Sheet Metal Ltd privacy notice.

Bells Sheet Metal respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

### 1. Important information and who we are

#### Purpose of this privacy notice

This privacy notice aims to give you information on how Bells Sheet Metal collects and processes your personal data, including any data you provide when purchasing a product or service.

It is important that you read this privacy notice 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.

#### Controller

Bells Sheet Metal Ltd is the controller and responsible for your data (collectively referred to as Bells Sheet Metal, “we”, “us” or “our” in this privacy notice)

We have appointed a data protection contact who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including requests to exercise *your legal rights* under GDPR, please contact us using the details set out below.

#### Contact Details

Our Full details are:

Full name of legal entity: Bells Sheet Metal Ltd

Name of person responsible: Denise Townsend

Email address: [denise@bellsheet.com](mailto:denise@bellsheet.com)

Postal address: Unit 1, Coin Street, Royton, Oldham OL2 6EE

Telephone number: 0161 627 0748

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, 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 notice and your duty to inform us of changes

The data protection law in the UK will change on the 25 May 2018. 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).

Personal data is, in simpler terms any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

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, username or similar identifier, title, role within the organisation;

**Contact Data** includes billing address, delivery address, email address and telephone numbers;

**Financial Data** includes bank account and payment card details;

**Transaction Data** includes details about payments to and from you or other details of products and services you have purchased from us;

**Technical Data** includes drawings, operating system and platform and other technology on the devices you may use to access our website;

**Profile Data** includes purchases or orders made by you, your preferences, feedback and survey responses.

### If you fail to provide personal data

Where we need to collect personal data to fulfil 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 Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Apply for our products and services;
- Apply for a credit account;
- Make a request for quotation;
- Complete contact details on our website;
- Take part in a survey; or
- Give us feedback

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services together with other payment gateways;
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based in the EU;
- Contact, Financial and Transaction Data from Credit Reference Agencies but only with your consent.

#### 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 we need to comply with a legal or regulatory obligation
- 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.

#### Purposes for which we will use your personal data

We have set out below, in 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.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer/supplier	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interest (to recover debts due to us)
To manage our relationship with you which will include (a) Notifying you about changes to our business, terms or privacy policy (b) Asking you to leave a review or take part in a survey	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep records updated and to study how customers rate and use our products/services)
To protect our business and administer our website (including troubleshooting, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation

## **Cookies**

Our website uses Session Cookies: These types of cookies do not personally identify the user or collect information from your computer/device. Once your browser is closed these cookies are fully erased.

## **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.

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 have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above:

- Internal Third Parties as set out in the Glossary;
- External Third Parties as set out in the Glossary;
- Specific Third Parties such as Distribution partners and couriers;
- 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 business 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 recognise and respect the security of your personal data and to handle it in accordance with the law. We do not allow 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.

## **6. International transfers**

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

## **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 unsanctioned way, altered or disclosed. In addition, we limit access to your personal data to those employees, contractors and other third parties who have a business need to know.

All our computers have effective anti-virus software which monitors our emails and systems for any viruses. Computers are password protected and back up hard drives are not kept on the premises at night

Hard copy data is kept in secure lockable filing cabinets in our offices

Should we suspect a personal data breach we will notify you and any appropriate regulator 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 necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data for the statutory 6 years.

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.

## 9. Your legal rights

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

You have a right to:

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data;
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact Denise Townsend at [denise@bellsheet.com](mailto:denise@bellsheet.com)

### 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.

### Time to respond

We will try to respond to all requested within one month. If your request is complex or you have made a number of requests, it may take us longer than a month, however if this is the case, we will notify you and keep you updated.

## 10. Glossary

### LAWFUL BASIS

**Performance of a 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 or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product with the most secure experience. We make sure we consider and balance any potential impact on you (be 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 over ridden by the impact on you (unless we have your consent or required/permitted to by law).

## **THIRD PARTIES**

### **Internal Third Parties**

Employees within the company acting as joint controllers or processors to provide IT and system administrations services and undertake leadership reporting.

### **External Third Parties**

- Service providers acting as processors based in the UK who provide IT and System administration services;
- 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;
- Logistical Partners, couriers and approved manufacturers where processing your data is necessary for the performance of a contract to which you are a party;
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

## **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 efficaciously 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 legal reasons which will be notified to you, if relevant, 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. On occasion, we may show 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: (1) if you want us to ascertain the data's accuracy; (2) where our use of the data is unlawful but you do not want us to erase it; (3) 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 (4) 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 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 and commonly used format. 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.

Date: 24<sup>th</sup> April 2018  
Signature: *D S Townsend*

Review Date: April 2020  
Position: Secretary

