

# Privacy Policy – Issued 25th May 2018.

#### Introduction

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of UK data protection laws, the data controller is John Gillman & Sons (Electrical) Limited of Mercia Road, St Oswalds Road, Gloucester, England, GL1 2SG.

## Data protection principles

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner than ensures appropriate security.

## Information you give to us

We may collect, use, store and transfer different kinds of personal information about you, including:

• Identity Data, such as your name, username or similar identifier, title,



- **Contact Data**, such as your billing address, delivery address, email address and telephone numbers,
- **Financial Data**, such as bank account and payment card details, credit checks and finance agreements
- Transaction Data, including details about payments to and from you, and other details of products and services you purchase from us,
- **Company Data**, including the name of the organisation you represent, and that organisation's Contact Data, Financial Data and Transaction Data,
- **Technical Data**, including IP addresses, your log-in 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,
- **Profile Data**, such as your username, password, purchases or orders made by you, your interests, preferences, feedback and survey responses,
- **Usage Data**, including information about how you use our website, products and services, and
- Marketing Data, such as your preferences in receiving marketing from us and our third parties, and your communication preferences.

#### 'Special category' data

Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as 'special category' data.

Depending on our relationship with you, and the work that you do with or for us, we may be required to undertake criminal record checks with the Disclosure and Barring Service. We will let you know if that is the case. It is possible that we may obtain information relating to your criminal convictions as a result.

Otherwise, during the course of dealing with you, we do not expect to collect any 'special category' data about you.

# How we collect your personal information

We may obtain personal information by directly interacting with you, such as:

- placing orders for products and services,
- receiving a request from you to prepare and submit a tender to supply you with products and services.



- creating an account on our website,
- participating in discussion boards or other social media functions on our website,
- entering a competition, promotion or survey organised by us, or otherwise providing us with feedback,
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you,
- meeting you at events, or when you visit our premises or we (or our engineers) visit yours, or
- corresponding with us by phone, email, letters, via social media or otherwise.

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- your local authority, housing association or other institutional landlord,
- analytics providers (such as Google),
- advertising networks,
- search information providers,
- providers of technical, payment and delivery services,
- product manufacturers where they ask us to provide servicing, repair or exchange services to you on their behalf
- referencing and credit referencing companies
- the Disclosure and Barring Service where we are required to undertake criminal record checks
- social media channels (such as LinkedIn, Facebook, Twitter, YouTube and other social media channels)
- Companies House and the electoral register.

How we use your personal information



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

- · you have given us consent,
- we need to perform a contract we are about to enter into, or have entered into, with you,
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

We will only use 'special category' information:

- · provided we have your explicit consent to use it,
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent,
- where it is necessary for reasons of substantial public interest,
- where you have previously made that data public knowledge, or
- if we need to use that data to establish, exercise or defence legal claims.

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

We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will use the information you give to us	Legal basis
To register you as a new customer	It will be necessary for the performance of the contract between you and us
To process your order and, if accepted, to deliver the products to you (including managing payments, fees and charges)	It will be necessary for the performance of the contract between you and us
Where you are acting as a representative of an organisation, then to register that organisation as a new customer	It will be necessary for our legitimate business interests, namely to with a view to providing products and services to your organisation
Where you are acting as a representative of an organisation, to process your instructions and, if accepted, to provide products and services to	It will be necessary for our legitimate business interests, namely to with a view to providing products and services to your organisation



your organisation (including managing	
payments, fees and charges)	
To obtain references, and/or conduct credit checks	It will be necessary in order to take steps prior to entering into a contract with you. It will also be necessary for our legitimate business interests, namely to ensure that you will be able to perform your obligations in the contract that will be entered into between you and us
To undertake criminal record checks with the	It will be necessary to compliance with a legal
Disclosure and Barring Service	obligation to which we are subject, namely complying with our statutory duty to protect children and vulnerable adults. It will also be necessary for the performance of a task carried out in the public interest, namely ensuring the protection of members of the public
To administer the terms of any agreement between you and us, including updating rental agreements and administering warranty details and claims	It will be necessary for the performance of the contract between you and us
Where you are acting as a representative of an organisation, to administer the terms of any agreement between us and your organisation, including updating rental agreements and administering warranty details and claims	It will be necessary for our legitimate business interests, namely to with a view to providing products and services to your organisation
To obtain further information about you and/or your organisation	It will be necessary for our legitimate business interests, namely to ensure we are fully aware of all issues relating to the products and services we are providing
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for products that you have ordered from us
To notify of any product recalls or safety notices	It will be necessary to compliance with a legal obligation to which we are subject. It will also be necessary for the performance of a task carried out in the public interest, namely ensuring that members of the protect are protected against failures in products and services
To notify you about changes to our terms of sale or this privacy policy	It will be necessary for our legitimate business interests, namely to ensure you are aware of our current terms and conditions



To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website. We will comply with our cookie policy when processing this information
To enable you to participate in a prize draw, competition or complete a survey	It will be necessary for our legitimate business interests, namely to study how customers use our products, to develop them and help grow our business
To invite you to trade events, shows and exhibitions and to showroom demonstrations	It will be necessary for our legitimate business interests to ensure you are aware of the latest legal developments in relation to the products and services we provide, and otherwise to develop our relationship with you outside of the working environment  Where you would not normally have a reasonable expectation of receiving such invites from us, we will only send you invites if you agree
To provide you with information about special offers and other products we sell that are similar to those that you have already received from us	Where you have previously received marketing communications from us, then it will be necessary for our legitimate business interests, namely to ensure you continue to receive communications that you have previously agreed to receive  In all other cases, we will only do this if you give us your consent
To provide you with information about special offers and other products we sell that may be of interest to you	We will only do this if you give us your consent



We will only use your personal information for the purpose(s) 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 information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### What if you cannot or will not provide us with your personal information

In order for us to supply you with the products and services you request, it is a contractual requirement for you to provide us with certain information. For example: when you purchase products in our store, we will need your payment details; when you purchase online, we'll need your name, contact details, payments details and delivery address; and when you open up an account with us, we'll need all the information set out in the account application form. If you do not provide us with that information, we will be unable to accept and process your order and deliver the products to you, or be unable to open your account.

## Cookie policy

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 website. 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.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:



Cookie	Purpose	More information
comparelist	Compare list products. expiry - session cookie	
hdf-hstop	Temporary filter state storage. expiry - session cookie	
hdf-hash	Temporary filter state storage. expiry - session cookie	
user	Remembers user data for quick login. expiry - 30 days	
userlogin	Stores user data upon successful login. expiry - 1 hour	
cookiesenabled	Flag to tell the site if cookies are in use. expiry - 6 hours	
uuid	Unique identifier for tying together transaction and statistical data. expiry - 6 hours	
SID	Session ID to connect the user to server side session data. expiry - session cookie	
_ga	Google analytics. Used to distinguish users.  Expiry - 2 years	https://developers.google.co m/analytics/devguides/collect ion/analyticsjs/cookie-usage
_gat	Google analytics. Used to throttle request rate. Expiry - 1 minute	
_gid	Google analytics. Used to distinguish users. Expiry - 24 hours	https://developers.google.co m/analytics/devguides/collect ion/analyticsjs/cookie-usage
bunting_visit_cookie	This is set by Bunting, a tool we use to provide product recommendations and further analyse how people interact with our website. Expiry – 5 minutes	



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reevoo_sp_ses.c838	This cookie allows Reevoo to provide its reviews and rating services.	
	Identifies user session and is used to correlate his/her actions done in one session. Expiry – 30 minutes	
reevoo_sp_id.c838	This cookie allows Reevoo to provide its reviews and rating services.	
	Identifies user and is used to correlate his/her actions. Expiry – 2 years	
reevooutmb	This cookie allows Reevoo to provide its reviews and rating services.	
	Determining Visitor Session. Expiry – 30 minutes	
reevooutmz	This cookie allows Reevoo to provide its reviews and rating services.	
	Tracking Traffic Sources & Navigation.  Expiry – 6 months	
reevooutmc	This cookie allows Reevoo to provide its reviews and rating services.	
	Determining Visitor Session. Expiry - session cookie	



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reevooutma	This cookie allows Reevoo to provide its	
	reviews and rating services.	
	Identifying Unique Visitors. Expiry – 2 years	
reevoomark_marker	This cookie allows Reevoo to provide its	
Toovoomant_mantor	reviews and rating services.	
	reviews and fathing services.	
	Identification of review display. Expiry – 1	
	month	
	THO THE	
inptime0_11729_en	Used to ensure that the content is	
	displayed quickly. Expiry - session cookie	
_hjClosedSurveyInvit	Hotjar cookie. This cookie is set once a	
es	visitor interacts with a Survey invitation	
	modal popup. It is used to ensure that the	
	same invite does not re-appear if it has	
	already been shown.	
	Expires automatically after 365 days	
hiDanaDalla	Hetier eaglie This eaglie is get once a	
_hjDonePolls	Hotjar cookie. This cookie is set once a	
	visitor completes a poll using the Feedback	
	Poll widget. It is used to ensure that the	
	same poll does not re-appear if it has	
	already been filled in.	
	Expires automatically after 365 days	
_hjMinimizedPolls	Hotjar cookie. This cookie is set once a	
	visitor minimizes a Feedback Poll widget. It	
	_	
	is used to ensure that the widget stays	



	minimizes when the visitor navigates through your site.  Expires automatically after 365 days	
_hjDoneTestersWidg ets	Hotjar cookie. This cookie is set once a visitor submits their information in the Recruit User Testers widget. It is used to ensure that the same form does not reappear if it has already been filled in.  Expires automatically after 365 days	
_hjMinimizedTesters Widgets	Hotjar cookie. This cookie is set once a visitor minimizes a Recruit User Testers widget. It is used to ensure that the widget stays minimizes when the visitor navigates through your site.  Expires automatically after 365 days	
_hjIncludedInSample	Hotjar cookie. This session cookie is set to let Hotjar know whether that visitor is included in the sample which is used to generate funnels.  Expires automatically after 365 days	



Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Except for essential cookies, all cookies will expire after a maximum of 2 years.

#### Disclosure of your information

We may share your personal information with some of the parties set out below:

- providers of product warranties, including Domestic & General, Blomberg, Electrolux UK, Miele UK, Beko UK, B/S/H Group, AGA Rangemaster, Repairtech UK,
- your local authority, housing association or other institutional landlord,
- other personnel within your organisation, or any other organisation that is party to or otherwise has a legitimate interest in the agreement between us and your organisation,
- providers of IT and system administration services to our business, including Mailchimp (for electronic mailings), Cromwell, PTX, Dropbox, One Drive, Microsoft, Google Drive and other online cloud providers,
- our professional advisers (including solicitors, bankers, auditors, insurers and consultants),
- HM Revenue & Customs, the Information Commissioner's Office, Construction Line, SMAS, CHAS, and other regulators, accreditation providers and authorities who require reporting of processing activities in certain circumstances,
- the Disclosure and Barring Service where we are required to undertake criminal record checks,
- sub-contractors, fulfilment partners and other third parties involved in the delivery process,
- Hitachi, Capitol Finance and other appropriate finance providers,
- Equifax, Euler Hermes and other appropriate referencing and credit referencing companies,
- analytics and search engine providers that assist us in the improvement and optimisation of our website, and
- 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 information in the same way as set out in this policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

## Where we store your personal information

All information you provide to us is stored on our secure servers in the United Kingdom.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **PCI DSS standards.** We comply with the Payment Card Industry Data Security Standards in relation to debit/credit card payments made on our website.
- Building entry controls. Electronic door control systems, restricted access, CCTV monitored areas
- **Secure lockable desks and cupboards**. Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- Methods of disposal. Paper documents are disposed of via an external company by shredding in a manner that ensures confidentiality.
- **Firewalls and Encryption**. We use up-to-date and industry-standard firewall and encryption software technology.
- Overseas transfers. Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Union, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long we will store your personal information



The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for the performance of a task carried out in the public interest	We will use/store your data for as long as it is in the public interest for us to do so
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data until we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

## Your rights

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

• You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.



- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact our Data Privacy Team by writing to the address at the top of this policy, or by emailing us at dataprivacy@gillmans.co.uk.

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

#### Opting out of receiving marketing communications

You can ask us to stop sending you marketing communications at any time by contacting our Data Privacy Team by writing to the address at the top of this policy, or by emailing us at dataprivacy@gillmans.co.uk.

Automated decision-making



When we deliver products to our customers, we use automated technology to calculate the best route for our delivery drivers to take, and your postcode will be used by us as part of that process. Otherwise, we do not use automated decision-making processes.

## 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.

#### Changes to our policy

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email or via social media. Please check our website frequently to see any updates or changes to our policy.

#### Contact

Questions, comments and requests regarding this policy are welcomed and should be addressed to our Data Privacy Team by writing to the address at the top of this policy, or by emailing us at dataprivacy@gillmans.co.uk.