

# Privacy Notice

## Introduction

We take your privacy very seriously and are committed to protecting your personal data. This Privacy Policy details how we, Steelo Ltd (**we, us**) collect, use and process personal data.

This Privacy Policy affects your legal rights and obligations so please read it carefully. If you do not agree to be bound by this Privacy Policy, please do not provide personal data to us.

We may update this Privacy Policy from time to time at our discretion and in particular to reflect any changes in applicable laws. If we do so, and the changes substantially affect your rights or obligations, we shall notify you if we have your email address. Otherwise, you are responsible for regularly reviewing this Privacy Policy so that you are aware of any changes to it.

We are the controller of the personal data provided to us for the purposes of applicable data protection legislation. This means it is our responsibility to ensure that the data we collect from you is controlled effectively and is protected at all times.

If you have any questions about the processing of your personal data, please contact us:

- By Post: Steelo Ltd, Unit 9 Fairway Trading Estate, Fairway Close, Feltham, TW4 6BU
- By Phone: 0208 569 8144
- By Email: [info@steelo.co.uk](mailto:info@steelo.co.uk)

## What personal data do we collect?

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

- *Contact Data* includes data such as your email address, telephone number and correspondence address
- *Identity Data* includes data such as first name, last name, username or similar identifier, date of birth, job title
- *Technical Data* includes data such as internet protocol (IP) address, your login data, browser type and version, cookies, 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 websites and any communications we may send to you.
- *Usage Data* includes information about how you use our websites such as information about your visit to our site, including the full Uniform Resource Locators (URL) clickstream to and through, pages you viewed or searches you made, page response times, download errors, length of visit, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- *Marketing Data* includes your preferences in receiving marketing information from us.
- *Financial Data* includes bank details, credit and debit card details.

## Personal data you provide to us

From time to time you may provide to us personal data. This may be because:

- You access and interact with any of our websites;
- You purchase or enquire about purchasing products from us

- You or your employer provide services to us;
- You apply to work with us as an employee;
- You provide feedback or reviews to us, respond to a survey or questionnaire;
- You otherwise contact us including with queries, comments or complaints.

We shall process all such personal data in accordance with this Privacy Policy. Certain personal data is mandatory to be provided to us in order that we can fulfil your request, for example to purchase products from us, and we shall make this clear to you at the point of collection of the personal data.

All personal data that you provide to us must be true, complete and accurate. If you provide us with inaccurate or false data, and we suspect or identify fraud, we will record this and we may also report this to the appropriate authorities.

When you contact us by email or post, we may keep a record of the correspondence and we may also record any telephone call we have with you.

#### Personal data we automatically collect about you

When you use our websites, we may automatically collect and store information about your Technical Data and Usage Data for the purposes of research and analysis.

Some of this information is collected using cookies and similar tracking technologies. If you want to find out more about the types of cookies we use, why, and how you can control them, please see our Cookies Policy.

#### Personal data we receive from others

If we reasonably believe that any of the personal data you have provided to us is inaccurate, we may receive further personal data from third parties, such as Companies House, credit reference agencies and the electoral register, confirming or otherwise, your identity.

We may also receive personal data about you from our third party service providers, including our payment service providers, and our analytic service providers.

If you apply to work with us, we may also receive personal data from your references.

#### Legal basis for processing your personal data

We will only use your personal data where we have a lawful basis to do so. The lawful purposes that we rely on under this Privacy Policy are:

- consent (where you choose to provide it);
- performance of our contract with you;
- compliance with legal requirements; and
- legitimate interests. When we refer to legitimate interests we mean our legitimate business interests in the normal running of our business which do not materially impact your rights, freedom or interests.

For example, if you register and use any of our websites, we shall use your personal data in order to provide you such access in accordance with our terms of use. Likewise, if you purchase products from us, we shall use your personal data to fulfil your order.

We may from time to time need to use your personal data to comply with any legal obligations, demands or requirements, for example, as part of anti-money laundering processes or to protect a third party's rights, property, or safety.

We may also use your personal data for our legitimate interests including:

- to improve our websites, products and business generally;
- in connection with, or during negotiations of, any merger, sale of assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company;
- to deal with any questions or comments you raise;
- for audit purposes; and
- to contact you about changes to this Privacy Policy as set out above.

### **Who do we share your data with?**

For our legitimate interests, we may share your personal data with our service providers, sub-contractors and agents that we may appoint to perform functions on our behalf and in accordance with our instructions, including:

- delivery companies
- installation service providers
- IT service providers such as website hosting companies, customer relationship management platforms
- marketing agencies
- payment providers
- professional advisers such as lawyers, accountants and auditors

We shall provide our service providers, sub-contractors and agents only with such of your personal data as they need to provide the service for us and if we stop using their services, we shall request that they delete your personal data or make it anonymous within their systems.

If we may need to use your personal data to comply with any legal obligations, demands or requirements, for example, as part of anti-money laundering processes or to protect a third party's rights, property, or safety then in doing so, we may share your personal data with third party authorities and regulatory organisations and agencies.

If we choose to merge, sell assets, consolidate or restructure, finance, or sell of all or a portion of our business by or into another company then the new owners may use your personal data in the same way that we do as set out in this Privacy Policy.

The information we gather about you will never be sold on to a third party.

### **Security**

We shall process your personal data in a manner that ensures appropriate security of the personal

data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. In particular, access is restricted to employees who need to know your personal data, and we use appropriate password protection and appropriate strong encryption electronic measures within our electronic data management systems.

However, unfortunately, because of the nature of electronic storage, we cannot promise that your personal data or any other data you provide to us will always remain secure. If there is a security breach, we will do all that we can as soon as we can to stop the breach and minimise the loss of any data.

## **Marketing**

You may consent to receive marketing email messages from us about our websites and our services and business generally. You can choose to no longer receive marketing emails from us by contacting us or clicking unsubscribe from a marketing email. Please note that it may take us a few days to update our records to reflect your request.

If you ask us to remove you from our marketing list, we shall keep a record of your name and email address to ensure that we do not send to you marketing information. If you still have an account with us, we shall continue to email you in relation to your account only.

## **Your rights**

You have a number of rights under applicable data protection legislation. Some of these rights are complex, and not all of the details have been included below. Further information can be found [here](#)

- Right of access: You have the right to obtain from us a copy of the personal data that we hold for you.
- Right to rectification: You can require us to correct errors in the personal data that we process for you if it is inaccurate, incomplete or out of date.
- Right to portability: You can request that we transfer your personal data to another service provider if you initially provided consent for us to use the personal data or where we used the personal data to perform a contract with you.
- Right to restrict or object to processing: In certain circumstances, you have the right to require that we restrict the processing of your personal information if you believe our processing impacts on your fundamental rights and freedoms. However, we may demonstrate that we have legitimate grounds to process your personal data notwithstanding your rights and freedoms.
- Right to be forgotten: You also have the right at any time to require that we delete the personal data that we hold for you, where it is no longer necessary for us to hold it. However, whilst we respect your right to be forgotten, we may still retain your personal data in accordance with applicable laws and when we respond to your request we shall notify you of any specific legal reasons that we have to retain your personal data
- Right to stop receiving marketing information: You can ask us to stop sending you information about our products, but we will continue to email you about any order you

have placed for those products.

We reserve the right to charge an administrative fee if your request in relation to your rights is manifestly unfounded or excessive, and we may ask for identification from you before we can fully respond to your request.

If you have any complaints in relation to this Privacy Policy or otherwise in relation to our processing of your personal data, please tell us. We shall review and investigate your complaint and try to get back to you within a reasonable time. You do also have the right to contact the Information Commissioner, see [www.ico.org.uk](http://www.ico.org.uk) or if you are based outside of the United Kingdom, please contact your local regulatory authority

### **Retention of personal data**

Subject to the provisions of this Privacy Policy, we will retain personal data in accordance with applicable laws.

This means that we shall retain your personal data for as long as you have an account with us or otherwise access or use our websites. However, we may also be required to retain personal data for a particular period of time to comply with legal, auditory or statutory requirements, including requirements of HMRC in respect of financial documents and in order to deal with any dispute you might raise.

Where we have no legal basis for continuing to process your personal data, we shall either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### **General**

Our websites may contain links to other sites. When you choose to visit those sites, we cannot assume responsibility for any other site's content or information handling practices. We encourage you to review each site's privacy policy prior to entering into transactions with the third party-linked site.

If any provision of this Privacy Policy is held by a court of competent jurisdiction to be invalid or unenforceable, then such provision shall be construed, as nearly as possible, to reflect the intentions of the parties and all other provisions shall remain in full force and effect.

This Privacy Policy shall be governed by and construed in accordance with English law and you agree to submit to the exclusive jurisdiction of the English Courts.

This Privacy Policy was last updated on 1 May 2020. You may contact us if you wish to review any previous version.

