

## **PRIVACY POLICY**

### **Introduction**

This Privacy Policy explains the types of personal data we may collect about you, and how we handle that data and keep it safe. This policy is relevant to you wherever you are based, whether that is in the UK, the European Economic Area (EEA) or elsewhere in the world.

If you have any questions after reading this document, please get in touch with us and we'll be happy to help.

### **Who we are**

Bellinger's Business ([www.bellingersbusiness.co.uk](http://www.bellingersbusiness.co.uk)), is the 'data controller' of the personal data you provide to us. This Privacy Policy explains how we use any personal information we collect about you.

If you need any further information you can write to us at: Bellinger's, 187 St Leonards Road, Horsham, RH13 6BD.

The lawful bases we rely on for processing your data

The law on data protection sets out a number of different reasons that a company may have for collecting and processing your personal data. These include:

#### Contractual obligations

We may need your personal data to comply with our contractual obligations, for example to deliver a service to you.

#### Consent

In certain circumstances we will collect and process your data with your consent – for example where you do not have an existing relationship with Bellinger's and have signed up to our email marketing list. We will only request the data that is necessary for the particular service to which you consent.

#### Legitimate interests

In certain circumstances we require your data to pursue our legitimate interests in a reasonable way as part of the running of our business. For example, if you

- have an existing relationship with Bellinger's as a customer
- have requested quotations or technical assistance

we will send you email communications with product and technical updates, and other information about Bellinger's we think will be of interest to you such as recent news stories or project references.

We will only process your data provided that it does not materially impact on your rights, freedom or interests. Furthermore, we will only send information that we believe is relevant to you and unlikely to cause you unwarranted distress or harm. We have conducted balancing and necessity tests to confirm the validity of this approach.

### **When we collect your personal data**

We may collect information about you when you:

- Contact us by any means with a query or complaint

- Book an appointment with us
- Attend a training event
- Place an order or enquiry for our services
- Supply us with goods or services
- Complete a supplier questionnaire
- Apply for a job with Bellinger's
- Accept a role and/or commence employment
- Attend one of our exhibition stands
- Provide us with a business card
- Complete an online sign up form
- Request an in person consultation or visit

At some exhibitions, the organiser may collect and forward registration and/or attendee data to us, but only when they have notified you in advance that they will do this. We will not use data that has been collected at exhibitions without your consent.

We may also collect your data via cookies when you visit our website.

[bellingersbusiness.co.uk](http://bellingersbusiness.co.uk) only uses cookies which are required to offer you a suitable level of web performance and to track website usage in Google Analytics. By continuing to use our website you are giving us your implied consent to our Cookie policy.

The Cookies we use to deliver the Google Analytics service store information such as the time you visited the website and whether you have visited before. The Cookies contain no personally identifiable information but they do use your computer's IP address to know where in the world you are accessing the internet from.

If you would like to restrict the use of Cookies you can control this in your Internet browser.

### **What data we collect**

- We will only collect the information we require in order to provide you with the service(s) you require.
- If you have an account with us, we will collect your full name, email address, telephone and mobile numbers, postal address and details of where you purchase products.
- If you have purchased services/products from us, we will collect your full name, email address, telephone and mobile numbers, postal address and any other details you have supplied to us. If you call to us we may use your personal information to assist us in answering your query.
- We may collect your social media user name if you proactively interact with us to raise a query through those channels. For example, we might share your personal information within our business if you raise a support request via social media.
- We will collect data relevant to any feedback forms you complete.
- If you apply for a job with Bellinger's we will collect details from your job application including your name, postal address, phone number and email address.
- For marketing purposes, we will only collect and/or use basic personal data about you such as your name, company name, work address and email address. We need to know this basic personal data in order to send you emails and/or postal communications that we believe will be of interest to you and/or provide additional information in relation to the products/services you have purchased.

- When entering into a contract to supply or receive goods/services we will collect your full name, email address, telephone and mobile numbers, postal address and the delivery details you have supplied to us.

#### Sensitive personal data

- Unless otherwise agreed with you, we will not collect any special categories of personal information about you (often known as 'sensitive personal data').

#### **What we do with your data and why**

- Processing orders
- We will use your data to process any orders you make by email.
- We may need to pass your details on to a third party such as a courier service to supply or deliver the services/product you ordered.
- We may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as providing proof of delivery, or support.
- We will enter your data into our customer database (CRM) so that we have a record of what goods/services you have purchased and when, as well as any other contact you have had with us such as raising a query or complaint. We may use your data to provide you with any support and technical information you require. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best possible services.
- Please be aware that if you choose not to share your personal data, we may not be able to provide some of the services or information you have asked for.

#### Marketing

- Where you have an existing relationship with us for example by purchasing from us or signing up for an account, we will enter your data into our email marketing platform and CRM so that we can send you communications by email or post with details of products, services and news that we believe will be of interest to you.
- We may also use your details to invite you to exhibitions or events.
- We will do this as part of our legitimate business interests in understanding our customers and providing the highest levels of customer service. You can opt out of these communications at any time by emailing us or selecting the unsubscribe link that we include with every marketing email.
- We will monitor your response to marketing emails and may follow up with you to ensure that you have all the information you need.
- We may use your details to get in touch for further information to support a press release or news story that we are writing about a recent service we have provided
- We may use your data to send you customer survey requests to help improve our services. These survey messages will not include any promotional content.

#### Recruitment

Where you have applied for a job vacancy with us, we will enter your data into our recruitment tracker so that we can send you communications by email or post that we believe will be of interest to you and enable you to progress through our selection and recruitment process.

## Service messages

- We will use your data to send you communications which are required by law or which are necessary to inform you about changes to the services we provide or other information relating to your orders.
- This may include updated price lists or changes to our contact details
- These service messages will not contain any promotional content.

We will only collect the personal data that we need in order to oversee the products and services we have agreed to provide you with or to send you relevant marketing information.

Please be assured that we will not sell or rent your information to any third parties.

## **How long we keep your data**

Whenever we collect or process your personal data, we'll only keep it for as long as necessary for the purpose for which it was collected.

At the end of that retention period, your data will be destroyed if it is no longer required for the lawful purpose(s) for which it was obtained. When you place an order, we'll keep the personal data you give us so that we can comply with our legal and contractual obligations in relation to that order. Examples of data retention periods:

Recruitment – we will keep applicants' information for a maximum period of 1 year from the point of filling the vacancy.

Marketing - We will generally keep the information we use for marketing purposes until you notify us that you no longer wish to receive marketing information from us. Where you have opted out of emails, we will keep a record of your request to opt out as this will ensure that you cannot be sent another email unless you supply your consent again.

## **Who processes your personal data**

All the personal data we hold about you will be processed by our own staff based in the United Kingdom. Data may also be processed by our third party suppliers as follows:

- We will share your data with third parties during the recruitment process to administer selection tests.
- We may share your data with third parties who undertake reference checks on our behalf. This will only be done with your explicit consent.
- We may share your data with other trusted third parties such as delivery couriers.

We will always take all reasonable steps to ensure that your personal data is processed securely and only provide the information that the third party requires to perform their specific services. If we stop using their services, any data held by them will either be deleted or rendered anonymous.

## **Where your personal data may be processed**

We may need to transfer your personal data between countries to enable us to supply the goods or services you've requested. Wherever you are located, your personal data may be stored on servers in the UK.

For individuals geographically located within the European Economic Area (EEA) we may sometimes need to share your personal data with third parties or suppliers outside that area such as our email services provider based in the USA. Where we do this, we always

ensure that your data receives the same level of protection as if it were processed within the EEA.

For individuals geographically located outside the European Economic Area (EEA) we will treat your personal data in exactly the same way as if you were located within the EEA and follow the same processes and procedures.

### **How we protect your personal data**

We will treat your personal data with the utmost care and take all reasonable steps to protect it. Access to your personal data is strictly controlled and limited to the most relevant users only.

We regularly monitor our systems for possible vulnerabilities and to ensure that they are completely secure and up to date.

### **Your rights concerning your personal data**

The new GDPR regulations provide you with the right to request:

- Access to the personal data we hold for you. In most cases this will be provided free of charge.
- That we amend your personal data if it is incorrect, out of date or incomplete.
- That we stop any marketing activity such as email marketing after you withdraw your consent or unsubscribe. We will always comply with your request.
- That we stop using your personal data for direct marketing or other purposes where we are contacting you on the basis of our legitimate interests. We will comply with your request unless we believe that we have a legitimate overriding reason to continue with that activity.
- That we erase all the data we hold about you.

You can find out more about your rights on the ICO website ([www.ico.org.uk](http://www.ico.org.uk)).

If you want to exercise these rights, you can contact us by email at [nsbellinger@me.com](mailto:nsbellinger@me.com).

If you are not satisfied with the way that we are processing your personal data, you may lodge a complaint with the ICO. Visit the ICO website to find out more <https://ico.org.uk/concerns> or call them on 0303 123 1113.

For individuals based outside the UK you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

### **How to stop the use of personal data for direct marketing**

You can stop receiving direct marketing by email or post at any time.

- To opt out of emails, click the unsubscribe link at the bottom of any marketing email we send you.
- To opt out of direct mail, email us at [nsbellinger@me.com](mailto:nsbellinger@me.com). Write 'unsubscribe to mail' in the subject line.

### **Any questions**

If you have any questions about our Privacy Policy that haven't been covered in this document, please contact us. To ensure that your query is dealt with by the most

appropriate person, it would be helpful if you could let us know whether you are a customer or supplier.

Email: nsbellinger@me.com.

Version 1 - February 2023