

# FinishAdapt Ltd

## Privacy Policy

### **Incorporating GDPR (General Data Protection Regulation) and PECR (Privacy and Electronic Communications Regulation)**

FinishAdapt is committed to ensuring that your privacy is protected. We respect and value the privacy of all of our customers and suppliers.

#### **What does this policy cover**

This privacy policy sets out how FinishAdapt Ltd collects, uses, stores and protects any information about you. It also explains your rights under the law relating to your personal information.

#### **Review of this policy**

FinishAdapt may change this policy from time to time. This policy is effective from 25th May 2018.

#### **Who we are**

We are FinishAdapt Ltd (also trading as FiniSHRINK), Unit 8 Hillmead Industrial Estate, Marshall Road, Swindon SN5 5FZ, UK. Company Number 02781247.

Email address: [privacy@finishadapt.com](mailto:privacy@finishadapt.com)

Telephone number: +44 (0) 1793 758720

#### **Legal basis for processing your personal information**

Under the GDPR we must have a lawful basis for using personal information. This basis is because:

- Consent. You have consented for us to use your personal information
- Contract. The processing is necessary for any contracts we have with you
- Legal obligation. The processing is necessary for us to comply with the law
- Legitimate interests. The processing is necessary for our legitimate interests or that of a third party, particularly for the proper administration of our website, business and direct marketing

#### **What information we collect**

We may collect the following information:

- Name, job title and title
- Company name and address
- Contact information including phone numbers and email address
- Cookies, IP addresses, geo tags, user sessions and browsing behaviour

We do not collect data about debit or credit cards. This information is collected by our third party payment processors (eg PayPal).

### **How we collect your information**

We obtain information about you from our websites, email, social media and by direct contact. You can be assured that this information will only be used in accordance with this privacy policy.

We do not buy or use lists of personal information from third parties.

### **How we use your personal information**

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Process orders that you have submitted
- Process supplier transactions
- Provide quotations and product information
- Communicating with you. This may include responding to emails or calls from you
- To improve our products and services
- To process employment applications
- For management and auditing of our business operations including accounting
- To monitor and keep records of our communications with you
- To maintain website content, functionality and performance
- For marketing purposes and to help us to offer you relevant products and services
- For sending you relevant notifications and newsletters
- To comply with the legal, financial and regulatory obligations and requirements

### **How and where we store or transfer your information**

Your information is stored securely in our UK based business systems. We may also store or transfer some of your personal information to countries that are not part of the UK or the European Economic Area (EEA). These are known as “Third Countries” and may not have data protection laws as strong as the UK or EEA. This means that we will take additional steps to secure your data (eg data encryption).

### **How your information is kept safe**

FinishAdapt maintains a high level of security of your personal information. The systems we use include password protection, encryption and we also use internet security technologies that are actively monitored against unauthorized access. We have access control to premises, facilities and systems.

### **How we use automated decision making and profiling**

We do not use any of these processes.

### **How long do we retain your personal information**

We will hold your personal information based on the following conditions:

- For as long as we have reasonable business needs (eg managing relationships with you and managing our operations)
- Retention periods in line with financial, legal and regulatory requirements

### **How and when can you withdraw your consent**

If we rely upon your consent to process your personal information, you can withdraw this at any time by contacting us using the contact details in this policy document.

### **How we share your personal information**

We may disclose your personal information to our suppliers or sub-contractors so we can fulfil our obligations to you (eg payment processors and delivery couriers).

In addition, we may also be required to provide your personal information to legal, regulatory or government authorities.

We will not sell your personal information to any third parties or share with anyone other than those noted above.

### **Your personal information rights**

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

If you have any cause for complaint about our use of your personal data you have the right to lodge a complaint to the Information Commissioner's Office which enforces data protection laws. Contact details are available at <https://ico.org.uk/> .

### **How you can access your personal information**

If required you may ask us for details of your personal information that we hold. This is known as a "Subject Access Request". These Requests should be made in writing and sent to our email or postal address as shown in the "Who we are" section of this document.

There is not normally any charge for this Subject Access Request. However if your request is "manifestly unfounded or excessive" (eg if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your Subject Access Request within one month.

### **PECR (Privacy and Electronic Communications Regulation)**

We will not send electronic mail marketing (emails or texts) to individuals without a specific consent unless they are previous customers under the 'soft opt-in' rule.

We may send marketing emails or texts to companies and we will always provide the opportunity to opt out.

## **General information**

### **How we use cookies**

We will ask you to consent to our use of cookies in accordance with this policy when you first visit our website.

Cookies are small pieces of information stored on your computer to allow a website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps to improve our website and deliver a better more personalised service.

It is possible to disable cookies by setting your browser preferences if required.

### **Links to other websites**

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy policy applicable to the website in question.