

This is the Privacy Notice for Classic Windows issued in accordance with the General Data Protection Regulation (GDPR) – please read it carefully.

1. Introduction

This Privacy Notice is to let you know how we handle your personal data. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This Privacy Notice explains how we do this and tells you about your privacy rights and how the law protects you.

Your personal data is any information relating to you from which you can be identified.

This notice sets out:

- how we will process any personal data that we collect from you and what it will be used for,
- the information that you are entitled to receive from us when we collect your personal data and
- your rights under the General Data Protection Regulation (GDPR) in connection with the way we handle your personal data.

Where you provide personal data about another person this Privacy Notice will also apply to that data so please show it to that person. This Privacy Notice applies to any personal data which you may provide to us in person, over the telephone, by e-mail, on our website and/or by post. This Privacy Notice also applies to any personal data which we may collect from third parties about you and/or which we may collect when you access our website and/or in the course of our relationship.

You can choose not to give personal data. We may need to collect personal data by law, or under the terms of a contract and/or relationship that we have with you. If you choose not to give us this personal data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services so we cancel a product or service you have with us.

Wherever we refer to “processing” of personal data in this Privacy Notice this includes any combination of the following activities: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

This Privacy Notice only applies to personal data collected by or on behalf of Classic Windows via the company’s website or by any other means. The company’s website may from time to time contain links to and from other websites (partner networks, advertisers and affiliates). If you follow a link to any external website or alternatively reach our website from a third party website, please be aware that these websites will have

their own privacy policies, separate from ours, and we therefore do not accept any responsibility or liability for these policies. Please check their policies before you submit any personal data to these websites.

2. Our Promise to You

We promise:

- To keep your personal data safe and only process it on valid legal basis
- To keep our records up to date and delete or correct inaccurate personal data
- Not to keep your personal data after the purpose has ended
- Not to sell your personal data
- To give you ways to manage and review your marketing choices at any time

You can contact our Data Protection Officer (DPO) at:

The Data Protection Officer
Classic Windows
Unit 4, Belle Vue Enterprise Centre
Ivy Road
Aldershot
Hampshire
GU12 4UA

or by email to dpo@classicwindows-south.co.uk

4. Legal Basis for Processing your Personal Data

We need to have a proper reason under the GDPR whenever we process your personal data ourselves or share it with others. These reasons are:

- To fulfil a contract we have with you or to take steps at your request prior to entering into a contract with you, or
- When it is our legal duty, or
- When it is in our legitimate interest or the legitimate interest of a third party except where such interests are overridden by your interests or your fundamental rights or freedoms, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to process your personal data, but this must not unfairly go against your rights. If we rely on our legitimate interest, we will tell you what that is.

In the section below this one is a list of all the ways that we may process your personal data, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

Unless we have your explicit consent to do so, we will not process special categories of personal data revealing any of the following: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life or sexual orientation.

5. Information we collect and how we collect it

We may collect personal data from you in the following ways:

- when you make an enquiry through our website
- when you contact us in person, over the telephone, by email, or by post
- at the point of purchasing options and extras from us
- in customer surveys
- when you use our services
- payment and transaction data

We may collect your personal data from third parties we work with including:

- Companies that introduce you to us
- Insurers
- Suppliers of materials and equipment
- Trade Contractors
- Comparison websites
- Social networks

Our website uses 'cookies' - a small file of letters and numbers that are stored on your computer by the websites you visit. We use cookies to improve your user experience by enabling the website to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie'), this enables us to show content relevant to you on your next visit. We also use cookies to track usage, analyse trends and gather information on how customers use our website which allows us to improve our website. Cookies are not linked to other personally identifiable information.

The type of information we may ask you to provide about yourself and therefore collect includes, but is not limited to:

- Contact Details: Name, address, contact telephone number (mobile and landline), e-mail address
- Budget
- Contractual Details about the products or services we provide to you.
- Locational Data we get about where you are, such as may come from your mobile phone or the address where you connect a computer to the internet

- Technical Details on the devices and technology you use.
- Communications: What we learn about you from letters, emails and conversations between us.
- Social Relationships: What we learn about your family, friends and other relationships that we record from conversation between you and us.
- Open Data and Public Records: Details about you that are in public records, such as the Electoral Register, and information about you that is openly available on the internet.
- Usage Data: Other data about how you use our products and services.
- Documentary Data: Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or bank statements (if requested).

If you apply for finance through bank or building society or claim through insurance policy we may keep the personal data obtained from third parties, such as copy finance agreement or insurance policy.

Please note that we may require this information to be able to respond to your enquiry or to provide our services. You can however at any time tell us to change or remove any personal data or to stop or restrict the processing of your personal data.

6. How we use your Personal Data

We may use the personal data collected/provided by you as follows:

1. To ensure that content from our website is displayed in the most effective way for you and for your computer/device
2. To respond to your enquiry
3. To send you information about similar products and services
4. To process and manage your order enquiry
5. To notify suppliers about your order.
6. To notify you about changes to our services
7. To carry out analysis to make improvements to our website and/or services
8. To measure or understand the effectiveness of advertising we deliver to you and others
9. To carry out agreements which have arisen from any contracts entered between you and us
10. To provide the guarantees/warranties in accordance with contract/agreement entered between you and us.
11. To assist you in applying for planning or building regulation approval or obtain Fensa Certification (if required)
12. To monitor customer satisfaction

13. To keep our records up to date
14. To develop and manage products and services, and what we charge for them.
15. To define types of customers for new products or services.
16. To develop and carry out marketing activities.
17. To study how our customers use our products and services
18. To manage how we work with other companies that provide services to us and our customers.
19. To make and manage customer payments.
20. To collect and recover money that is owed to us.
21. To comply with laws and regulations that apply to us.
22. To manage risk for us and our customers.
23. To respond to complaints and seek to resolve them.
24. To run our business in an efficient and proper way.

Our legal basis under the GDPR for each of these purposes are as follows:

LEGAL BASIS	USE STATED ABOVE
To fulfil a contract that we have with you or to take steps at your request prior to entering into a contract with you:	2, 3, 4, 9, 10, 19, 20, 22,
To comply with our legal duty:	5, 11, 13
It is in our legitimate interest or the legitimate interest of a third party except where such interests are overridden by your interests or your fundamental rights or freedoms:	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23,24
We have your consent to it:	2,3,4,5,6,9,10,11,13,19,21,22,23,

Where we have stated above that our grounds are that we have your consent, we will understand your consent to have been given when you expressly accept these terms. You can withhold or withdraw your consent at any time using the contact details for the DPO or the Company Secretary in this notice.

Where we don't have your express consent we may base our processing of your personal data on any other basis that applies.

If we intend to use your personal data for any purpose not stated above we will first notify you of the intended use.

If you no longer wish for us to communicate with you, you can contact us by post or by email noted above.

7. Sharing your Personal Data

We may disclose your personal data to third parties in certain circumstances but we will not sell, rent or trade your personal data.

Where relevant, we may give third party providers who supply services to us, or who process personal data on our behalf, access to your personal data in order to help us to process it for the purposes set out above. When doing so, we will ask them to confirm that their security measures are adequate to protect your personal data.

Within the purposes set out above we may share your personal data with the following third parties:

- In respect of the products you have purchased through Classic Windows
- With your consent, we will also pass your personal data on to third parties, for example if you ask us to put you in contact with professional advisors.
- We may disclose your personal data to third parties working on our behalf to help us improve our services and products i.e. to request feedback from you on your experiences following completion of installation
- We may disclose your personal data to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our contracts with you; or to protect our rights, property, or our safety and/or the safety of our customers, or others.
- We may need to confirm your identity before we provide products or services to you or your business. We may also share your personal information as needed to help detect fraud and money-laundering risks. We may allow law enforcement agencies to access your personal data. This is to support their duty to detect, investigate, prevent and prosecute crime.
- We may disclose your personal data to third parties in the event that we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer of such business or assets. If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.

8. How we use your information to make automated decisions

We sometimes use systems to make automated decisions based on personal data we have – or are allowed to collect from others – about you. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future, or the price that we charge you for them.

Here are the types of automated decision we make:

- Pricing and approving credit

We may decide what to charge for some products and services or whether to offer credit-based products or services.

Credit scoring uses data from three sources:

- Your application form
- Credit reference agencies
- Data we may already hold.

- Tailoring products and services

We may place you in groups with similar customers. We use these to better understand our customers' needs, and to make decisions based on that understanding. This helps us to design products and services for different customer types, and to manage our relationships with them.

- Profiling

We may use personal data to identify recipients for direct marketing by us or by third parties on our behalf. However we will not sell or rent data.

9. Protecting your information

We will seek to keep your personal data secure by taking appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Only authorised personnel and third parties will have access to your personal data.

We will retain your personal data for no longer than the period of time needed for the purposes that we collected the data and for as long as we have legal grounds to retain it. There is no fixed period after which all record of your personal data will be deleted as this will depend on the circumstances and the purposes of the processing but we will take steps and maintain policies to keep retention under proper review. We will not seek your consent before deleting any personal data.

If you purchase any products from Classic Windows we will need to retain your personal data relating to your order for 15 years after installation date.

10. Changes to this Privacy Notice

Any changes we may make to this Privacy Notice in the future will be posted on this website. Please check back frequently to see any updates or changes to this Privacy Notice.

11. Your Right of access to your Personal Data

You have the right to access your personal data including us providing to you , without charge, a copy (which may be in electronic form) of any of your personal data that we are holding or using (referred to as “processing”) or that third parties are processing on our behalf.

We will also provide to you, if you request it, the following information:

- a. the purposes of the processing;
- b. the categories of personal data concerned;
- c. the recipients or categories of recipient to whom the personal data have been or will be disclosed,
- d. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e. if the personal data was not collected from you, any information available to us as to the source of it;
- f. whether the personal data has been subject to automated decision-making, including profiling, and if so information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Requests for this information or a copy of your personal data should be in writing, enclosing proof of identification and a copy of your Contract/Agreement provided to you at beginning of the transaction.

**The Data Protection Officer
Classic Windows
Unit 4, Belle Vue Enterprise Centre
Ivy Road
Aldershot
Hampshire
GU12 4UA**

12. Your Right to Removal or Correction of Personal Data and to Restriction of Processing

You have the following rights under GDPR:

- a right to request us to correct inaccurate or incomplete data (“Right to rectification”)

- a right to request us to delete any of your personal data. In certain circumstances (for example, where you have purchased from us) we may wish to retain data and if GDPR allows us to do so we will inform you of our grounds
- a right to request us to stop or to restrict any aspect of the processing of your personal data. In certain circumstances we may wish to continue and if GDPR allows us to do so we will inform you of our grounds

In each case we will tell you what action we are taking and we will also notify any third party to whom the data has been disclosed.

14. Your Right to Data Portability

You have the right to receive from us the personal data that you have given us in a structured, commonly used and machine-readable format (“Right to data portability”) and/or to have the data sent by us directly to another party. Please note that this right only applies in certain circumstances, which is when we held the data on grounds of your consent or to perform a contract with you or for steps preparatory to such a contract and we were processing that data by automated means.

15. Your Right to Complain to the Regulator

Please let us know if you are unhappy with how we have processed your personal data. You can contact us on the contact details at the “Contact Us” link on our website or by writing to the Data Protection Officer at the address given above.

You have the right to lodge a complaint with the Information Commissioners Office (ICO) which is the UK supervisory authority for the processing of personal data. Further details are available on the ICO’s website.

16. Enquiries and to Exercise your Rights

If you have any questions, or want more details about how we process your personal data, or if you wish to exercise any of your rights you can contact us on the contact details at the “Contact Us” link on our website or by writing to the Data Protection Officer at the address given above.