

Privacy Policy

INTRODUCTION

Welcome to Carlton Manufacturing's privacy note.

Carlton Manufacturing respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data whenever that information is provided to us. This includes when you, or your business, request information from us, contact us (or we contact you), apply to set up an account with us, purchase goods or services from us, use our website(s)/apps, link to or from our website(s)/apps, or any other engagement we have with you (regardless of where you are based). It also tells you about your privacy rights and how the law protects you.

This policy should be read in conjunction with our applicable terms and conditions of website use and our cookie policy. The Terms & Conditions of Use for Consumers, and the Terms & Conditions of Use for Trade are available on our website.

This privacy notice is provided in a layered format as per the specific areas set out below.

1. [**IMPORTANT INFORMATION AND WHO WE ARE**]

2. [**THE DATA WE COLLECT ABOUT YOU**]

3. [**HOW IS YOUR PERSONAL DATA COLLECTED**]

4. [**HOW WE USE YOUR PERSONAL DATA**]

5. [**DISCLOSURES OF YOUR PERSONAL DATA**]

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1. **IMPORTANT INFORMATION AND WHO WE ARE**

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Carlton Manufacturing collects and processes your personal data in our dealings with you, including in providing goods and services to you, and including any data you may provide through our website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Carlton Manufacturing is the controller of your personal data and responsible for our website. Carlton Manufacturing is part of the Grafton Group. Current members of the Grafton Group can be found here - <http://www.graftonplc.com/our-business/our-brands.aspx>

Grafton Group has appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Carlton Manufacturing Ltd

Title: Marc Case The Data Protection Officer

Email address: marc.case@carltonmanufacturing.co.uk

Postal address: Willow House, Strathclyde Business Park, Bellshill, ML4 3PB

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This privacy notice was last updated on 23/05/18.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes [first name, last name, username or similar identifier, [marital status,] title, [date of birth] and gender].
- **Contact Data** includes [billing address, home address, email address and telephone numbers].
- **Financial Data** includes payment card details and, where you or your business have or apply for a credit account with us, bank account details and information held by credit reference and fraud prevention agencies.

- **Transaction Data** includes [details about you/your business trading history, including payments from you/your business].
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website/or any apps].
- **Profile Data** includes [your username and password, products/services provided to you/your business, [feedback and survey responses]].
- **Usage Data** includes information as to how you use our website.
- **Marketing and Communications Data** includes [your preferences as to whether you are happy to receive marketing from us and, if so, your communication preferences].

[We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.]

In the normal course, we will not collect **Special Categories of Personal Data** about you. Criminal offences may, however, appear on credit references or anti-fraud checks we may make.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a contract you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, via this website, apps or on social media, or otherwise. This includes personal data you provide when you or your business:
 - subscribe to our newsletter and/or other publications;
 - request a brochure or other promotional or marketing materials to be sent to you/your business;
 - apply for, or operate, a credit account with us;
 - purchase goods [and/or services] at one of our stores;
 - purchase goods [and/or services] via our website;
 - enter a competition, or respond to a promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy on our website for further details.
- **Third parties and publicly available sources.** We may receive personal data about you from various third parties and public sources.

- Credit reference agencies and fraud prevention organisations. When you or your business in which you are a partner or a director makes an application for a credit account with us, we will or may make searches about you with credit reference agencies and fraud prevention organisations. Searches are made against addresses provided, and so may also return information relating to other household members. The relevant agencies/organisations will keep a record of that search, and will share information from their records with us and with other business assessing applications for credit and to prevent fraud. We will record information as to your/your business' trading history with us, and share this information with credit reference agencies and fraud prevention organisations. Should it become necessary to review a credit account, a further check with credit reference agencies and fraud prevention organisations may be made, and a record kept by them of the search.
- Debt collection and debtor tracing organisations. Where your/your business' debts are unpaid, we may share your personal information with relevant debt collection and/or debtor tracing agencies.
- Other businesses in the same or related sectors. As part of our credit referencing and anti-fraud procedures we may make enquiries of other businesses in the same or related sectors as to your/your business' trading history with them, and may share information as to your/your business' trading history with us.
- Technical Data from analytics providers and search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message;

You have the right to withdraw consent at any time by [Contacting us](#).

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to an enquiry from you.	(a) Identity (b) Contact	Necessary to take steps at your request prior to entering into a contract with you.
To undertake credit-referencing and anti-fraud checks in connection with applications for and the operation of a credit account with us.	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary to take steps at your request prior to entering into a contract with you. Necessary for our legitimate interests in protecting our business from insolvent customers and fraud. Necessary for means of substantial public interest (preventing fraud).
To provide goods and/or services to you, and to collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you Necessary for our legitimate interests (to operate our business and recover debts due to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you for feedback	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Usage	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our services) Your consent (email/SMS marketing)
To administer and protect our business including our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
[To deliver relevant website content to you [and measure or understand the effectiveness/usability of our website]	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing and customer relationships	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To deal with issues, complaints or disputes arising out of our relationship with you/your business, and to prevent	(a) Identity (b) Financial (c) Technical	To establish, exercise or defend legal claims

or detect crime, including fraud	(d) Profile (e) Usage	
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When we refer to legitimate interests we mean the interest of our business in conducting and managing our business to enable us to give you the best service/product. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

We do not undertake automated decision making using your personal data.

MARKETING/PROMOTIONAL OFFERS

We strive to provide you with choices regarding certain personal data uses, particularly around marketing.

Where you have agreed to receive it, we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which goods, services and offers may be relevant for you.

We will only share your personal data for marketing purposes in accordance with your preferences/consent.

You can ask us to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by [Contacting us](#) at any time.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, see the cookie policy on our website.

CHANGE OF PURPOSE

We will only use your personal data for the purposes 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the categories of parties set out below for the purposes set out in the table in paragraph 4 above.

- Other companies in the Grafton Group based within the European Economic Area involved in providing goods and/or services to you, whether directly or providing underlying infrastructure services.
- External third parties, including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or

you;

- analytics and search engine providers that assist us in the improvement and optimisation of our services and website;
 - professional advisers, including lawyers, banks, auditors and insurers;
 - HM Revenue and Customs, regulators and other authorities;
 - entities involved in credit checking and anti-fraud activities, crime prevention/detection, risk assessment and management and dispute resolution.
- Third parties 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 data in the same way as set out in this privacy notice.

Where these third parties are our processors, we require them to respect the security of your personal data and to treat it in accordance with the law. [We do not allow our third-party processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.] Some of the third parties mentioned above, for example many professional advisers and HM Revenue and Customs, are controllers who, like us, are subject to specific obligations under data protection law, and who will have their own privacy notices setting out how they deal with personal data.

6. INTERNATIONAL TRANSFERS

As described in paragraph 5 above, we may share your personal data within the Grafton Group. All companies in the Group are currently based in the European Economic Area (EEA).

Though we do not seek actively to transfer personal data outside the EEA, some of the external third parties we deal with are based outside the EEA or process personal data outside the EEA, so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we look to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. [For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).]
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. [For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).]
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. [For further details, see [European Commission: EU-US Privacy Shield](#).]

Please [Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. Processors we appoint will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

[Details of retention periods for different types of your personal data are [available in our retention policy which you can request from us by [Contacting us](#)].

OR

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [*Request access to your personal data*].
- [*Request correction of your personal data*].
- [*Request erasure of your personal data*].
- [*Object to processing of your personal data*].
- [*Request restriction of processing your personal data*].
- [*Request transfer of your personal data*].
- [*Right to withdraw consent*].

If you wish to exercise any of the rights set out above, please [Contact us](#)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed

to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to enable us to deal with your request or to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or we have received a number of requests. In this case, we will notify you and keep you updated.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

10. MONITORING

We may monitor and/or record:

- (a) telephone calls;
- (b) transactions [and activities at all points of contact];
- (c) web, traffic and activities

These are to ensure that we carry out your instructions accurately, for training purposes and to improve our services, and to ensure security and prevent fraud. For the greater security of our customers and staff, and to prevent and detect crime, we use CCTV in and around our premises. To obtain information about our use of CCTV, contact us.