

# Data Protection Privacy Policy

David Mann & Sons Ltd

## CONTENTS

1. Introduction
2. Explaining the law
3. When we collect your personal data
4. The personal data we collect
5. How and why we use your personal data
6. How we protect your personal data
7. How long we'll keep your personal data for
8. Who we share your personal data with
9. What are your rights?
10. How you can stop the use of your personal data for marketing?
11. Creation Consumer Finance
  - 12.1 How we use your personal data
  - 12.2 How our providers use your personal data
  - 12.3 Joint use of your personal data
12. Contacting the Regulator
13. If you live outside the UK
14. Any questions?

# 1. Introduction

This Privacy Notice explains the types of personal data that we collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We hope the following sections will answer any questions you have but please do not hesitate to contact us if not.

*It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.*

## 2. Explaining the law

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

### Consent

In specific situations, we can collect and process your data with your consent.

*For example, when you tick a box to receive email newsletters.*

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

### Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

*For example, if you order an item from us for home delivery, we'll collect your address details to deliver your purchase, and pass them to our courier.*

### Legal compliance

If the law requires us to, we may need to collect and process your data.

*For example, we can pass on details of people involved in fraud or other criminal activity affecting David Mann & Sons Ltd to law enforcement .*

### Legitimate interest

In some situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

*For example, we will use your purchase history to send you or make available personalised offers.*

*We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.*

### 3. When we collect your personal data

- When you use your account to buy products and services, or redeem vouchers, in a shop or online.
- When you make an online purchase.
- When you create an account with us.
- When you purchase a product or service in store or by phone but don't have (or don't use) an account.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you enter prize draws or competitions.
- When you book any kind of appointment with us or book to attend an event.
- When you comment on or review our products and services.
- Any individual may access personal data related to them.
- When you fill in any forms. For example, if an accident happens in store, David Mann & Sons Ltd may collect your personal data.
- When you've given a third party permission to share with us the information they hold about you.
- We collect data from publicly-available sources (such as credit search) when you have given your consent to share information or where the information is made public as a matter of law.

## 4. The personal data we collect

- If you have a web account with us: your name, gender, date of birth, billing/delivery address, orders and receipts, email and telephone number. For your security, we'll also keep an encrypted record of your login password.
- Details of your interactions with us in store or online.

*For example, we collect notes from our conversations with you, details of any complaints or comments you make and details of purchases you made.*

- Copies of documents you provide to prove your age or identity where the law requires this. (including your passport and driver's license). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.

We'll only ask for and use your personal data collected for recommending items of interest and to tailor your shopping experience with us. Of course, it's always your choice whether you share such details with us.

- Payment card information.
- Your comments and product reviews.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

## 5. How and why we use your personal data

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you. In the case of loyalty scheme members, we'll also offer you relevant rewards.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

*For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.*

### Here's how we'll use your personal data and why:

- To process any orders that you make by using our websites or in store. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

*For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered, and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.*

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. 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 service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, and telephone about relevant

products and services including tailored special offers, discounts, promotions, events, competitions and so on.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you relevant, personalized communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.
- To comply with our contractual or legal obligations to share data with law enforcement.

*For example, when a court order is submitted to share data with law enforcement agencies or a court of law*

- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.
- To process your booking/appointment. Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers or a fitter visiting your home). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request.
- For reward cardholders: to provide you with tailored offers, printed with your till receipt at the end of a shopping trip. These are based on an analysis of previous purchases using your reward card, including the items you've just bought. We do this on the basis of our legitimate interest to show you relevant offers. Of course, you're free to choose whether to take advantage of them.

## 6. How we protect your personal data

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

Access to your personal data is password-protected, and sensitive data such as payment card information) is secured and tokenized to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

## 7. How long we'll keep your personal data for

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

At the end of that retention period, your data will either be deleted completely or anonymized, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

### **Some examples of customer data retention periods:**

#### **Orders**

When you place an order, we'll keep the personal data you give us for six years so we can comply with our legal and contractual obligations. In the case of certain products, such as electrical and nursery items, we'll keep the data for 10 years.

#### **Warranties**

If your order included a warranty, the associated personal data will be kept until the end of the warranty period.

## 8. Who we share your personal data with

We sometimes share your personal data with trusted third parties.

*For example, delivery couriers, technicians visiting your home, for fraud management, to handle complaints, to help us personalise our offers to you and so on.*

**Here's the policy we apply to those organisations to keep your data safe and protect your privacy:**

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

**Examples of the kind of third parties we work with are:**

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Our direct marketing to help us manage our electronic communications with you.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites.

To help personalize your journey through Partnership websites we currently use the following companies, who will process your personal data as part of their contracts with us:

- Twitter
- Instagram
- Facebook

## 9. What are your rights?

### An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a warranty).
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You have the right to request a copy of any information about you that David Mann & Sons Ltd holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact David Mann & Sons Ltd, 101 -105 High Street, Cranleigh, Surrey, GU6 8AY or email [shop@mannsofcranleigh.co.uk](mailto:shop@mannsofcranleigh.co.uk).

If we choose not to action your request we will explain to you the reasons for our refusal.

### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

### Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## 10. How you can stop the use of your personal data for marketing?

You can stop marketing communications from us:

- Write to David Mann & Sons Ltd, 101 -105 High Street, Cranleigh, Surrey, GU6 8AY or email [shop@mannsofcranleigh.co.uk](mailto:shop@mannsofcranleigh.co.uk).

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

# 11. Creation Consumer Finance

## 11.1 How we use your personal data

When you purchase a product or service from Creation Consumer Finance, we might receive a copy of the information you supplied.

## 11.2 How our providers use your personal data

When you then apply for a product or service from Creation Consumer Finance, your data will be collected and used by them under the terms of their own separate privacy policies.

## 11.3 Joint use of your personal data

We will share data with Creation Consumer Finance to bring you relevant offers, updates, products and services, and discounts that reward your loyalty to our brands.

We may check your details with appropriate third parties (for example credit reference agencies, such as Experian) before we send you promotions for our financial services products, to ensure your information is accurate and fulfils our legal and regulatory obligations, and to tailor those offers to you.

Rest assured that all applications for financial services products will be assessed on a case-by-case basis.

## 12. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling [0303 123 1113](tel:03031231113).

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

## 13. If you live outside the UK

### For all non-UK customers

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

This may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers in the UK.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

## 14. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact a member of staff who will be pleased to help you:

- Email us at [shop@mannsofcranleigh.co.uk](mailto:shop@mannsofcranleigh.co.uk)
- Or write to us at **David Mann & Sons Ltd, 101 -105 High Street, Cranleigh, Surrey, GU6 8AY**

This notice was last updated on 22/05/2018