



## Privacy Policy

### Introduction

Clow Group Ltd. collects and processes personal information relating to customers, clients, suppliers and individuals with whom we form a working relationship. This personal information may be held by Clow Group Ltd. on paper or in electronic format.

Clow Group Ltd. is committed to being transparent about how it handles your personal information, the privacy and security of this information and its data protection obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). The purpose of this Privacy Policy is to make you aware of how and why we will collect and use your personal information. We are required under UK GDPR to notify you of the information contained in this Privacy Policy.

This Privacy Policy applies to all users of our products and services and to all individuals with whom we have a business or working relationship. Clow Group Ltd. is the Data Controller for the purposes of UK data protection legislation and responsibility for data protection compliance is managed internally by designated company directors.

For questions about this Privacy Policy or how we manage your personal information, please contact the Data Controller at Clow Group Ltd., 185 Broad Street, Glasgow, G40 2QR, or by email at [data.controller@clowgroup.co.uk](mailto:data.controller@clowgroup.co.uk).

This Privacy Policy applies to information collected and processed by Clow Group Ltd., its subsidiaries and its websites and social media platforms. These include [www.clowgroup.com](http://www.clowgroup.com), [www.clowgroup.co.uk](http://www.clowgroup.co.uk), [www.ladders-direct.com](http://www.ladders-direct.com), [www.brushstore.co.uk](http://www.brushstore.co.uk), [www.ukstc.co.uk](http://www.ukstc.co.uk) and [www.uksafetytrainingcompany.co.uk](http://www.uksafetytrainingcompany.co.uk)

### Data Protection Principles

Under UK GDPR and the DPA 2018, there are six data protection principles that must be complied with by Clow Group Ltd., these principles require that any personal information we process is:

- Processed lawfully, fairly and in a transparent manner
- Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to those purposes
- Accurate and, where necessary, kept up to date
- Kept in a form which permits your identification for no longer than is necessary for those purposes
- Processed in a way that ensures appropriate security of the data

Clow Group Ltd. is responsible for, and must be able to demonstrate compliance with these principles.

## What types of personal information do we collect about you ?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data, i.e. where all identifying particulars have been removed.

This information may include:

- your contact details, including your name, address, telephone number and e-mail address
- financial and payment information - please note: financial and credit/debit card information is not held on any of our servers or processed directly on any of our websites. Online payments are processed securely by authorised third-party payment service providers. We do not store complete payment card details on our systems and our employees do not have access to your full payment card information. This also applies to offline credit/debit payments, (ie. payments made in person or over the telephone), where no record of complete financial information is held within the company – payments are processed in accordance with the Payment Card Industry Data Security Standard, (PCI DSS), which is designed to ensure that companies which accept, process and transmit credit card information maintain a secure environment.
- technical data related to website usage and functionality

Please note our websites and services are not directed at children and we do not knowingly collect personal information from children. If we become aware that personal information has been provided by a child without appropriate consent, we will take reasonable steps to remove that information from our records.

## How do we collect your personal information ?

Clow Group Ltd. collects, uses and processes a range of personal information about you.

This includes, (as applicable), information that may be gathered from data provided by filling in forms on our websites or by otherwise engaging or corresponding with us by phone, e-mail or otherwise, including in relation to purchasing products and services from us. This includes information you provide when you register to use our websites, make enquiries, subscribe to our services, search for products or services, place an order on our websites, enter a competition, promotion or survey or when you report an issue, participate in discussion boards or participate in other social media functions on our websites or social media platforms.

Information may also be collected about visits to our websites and social media platforms, including the Internet Protocol (IP) addresses used to connect your computer or device to the Internet, login information, browser types and versions, time zone settings, browser plug-in types and versions, operating systems and platforms.

We may also collect information about how our websites are used, including pages viewed, search terms used, links clicked, the date and time of visits, time spent on pages, technical information about your device and browser, and website performance information such as page response times and download errors.

Our websites use cookies and similar technologies to provide essential website functionality. Where consent has been provided, cookies are also used to collect website analytics information to help us understand how our websites are used and how we can improve them. You can manage your cookie preferences at any time through our cookie settings.

We may also receive information about you from third parties, (eg. business partners or sub-contractors with regard to payment, delivery and technical services, advertising, analytics, search information or credit references).

## Why and how we use your personal information ?

We only use your personal information where we have a lawful basis to do so under UK GDPR and the DPA 2018.

Depending on the purpose for which we use your personal information, we may process it:

- to fulfil a contract with you, including providing products and services, processing orders and managing customer accounts
- to comply with legal and regulatory obligations, including accounting, taxation and other statutory requirements
- where you have given your consent, such as for marketing communications or website analytics
- where it is necessary for our legitimate business interests or those of trusted third parties, provided that your rights and freedoms do not override those interests

Legitimate interests may include operating and improving our business, responding to enquiries, maintaining customer and supplier relationships, keeping our websites and IT systems secure, preventing fraud, protecting company information and establishing, exercising or defending legal claims.

We may use your personal information to:

- maintain accurate records and contact details;
- provide products, services and customer support;
- administer contracts and business relationships;
- comply with legal, regulatory and contractual obligations;
- notify you about important information relating to our products or services;
- manage and improve our websites, systems and online services;
- analyse website usage and performance where consent has been provided;
- establish, exercise or defend legal claims; and
- protect the security of our business, systems and information.

We may also process personal information where necessary to protect your vital interests or those of another person.

Where the law allows, we may process personal information without your consent where another lawful basis applies.

We may occasionally send information about our products, services, training courses, offers and other business updates where we have your consent or are otherwise permitted to do so by law. You can opt out of receiving marketing communications at any time by using the unsubscribe link in our emails or by contacting us directly.

## **What if you fail to provide personal information ?**

If you fail to provide certain personal information when requested or required, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory or contractual rights.

## **Change of Purpose**

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for a purpose other than that for which it was collected, we will provide you, prior to that further processing, with information about the new purpose, we will explain the legal basis which allows us to process your personal information for the new purpose and we will provide you with any relevant further information. We may also issue a new privacy policy to you.

## **Who has access to your personal information ?**

Your personal information may be shared internally within Clow Group Ltd. and our subsidiaries, including with members of the Sales, Accounts, Despatch and Technical departments along with IT staff if access to your personal information is necessary for the performance of their roles.

Clow Group Ltd. may also share your personal information with third-party service providers (and their designated agents), including:

- business partners, suppliers, sub-contractors and couriers for the performance of any contract we enter into with them or you
- analytics and search engine providers for the sole purpose of assisting us in the improvement and optimisation of our websites
- credit reference agencies for the purposes of assessing your credit score where this is a condition of us entering into a contract with you
- external IT services
- external auditors
- professional advisers, such as lawyers and accountants
- where you have otherwise consented to disclosure

We may also need to share your personal information with a regulator or to otherwise comply with the law.

We may share your personal information with third parties where it is necessary to administer the contract we have entered into with you, where we need to comply with a legal obligation, or where it is necessary for our legitimate interests, (or those of a third party).

We require any third parties with whom we have shared your personal information to comply with the law and meet the data privacy standards and requirements as defined within the UK GDPR and the DPA 2018.

## **How does Clow Group Ltd. protect your personal information ?**

Clow Group Ltd. has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed, used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities.

Where your personal information is shared with third-party service providers, we require all third parties who process personal information on our behalf to implement appropriate technical and organisational security measures, maintain confidentiality and comply with applicable data protection legislation. Where required, we put appropriate contractual arrangements in place to ensure personal information is processed and protected in accordance with UK GDPR and the DPA 2018. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

We do not use automated decision making and do not make decisions about individuals solely by automated means, nor do we carry out profiling that has a legal or similarly significant effect on individuals.

Clow Group Ltd. also has procedures in place to deal with suspected data security breaches and we will notify the Information Commissioner's Office, (or any other applicable supervisory authority or regulator), and you of any suspected breach where we are legally required to do so.

## **How long does Clow Group Ltd. keep your personal information ?**

Clow Group Ltd. will only retain your personal information for as long as necessary for the purposes for which it was collected. In general we keep customer, supplier and order records for up to 7 years after our last business transaction with you. Financial and tax records are usually kept for up to 7 years to meet legal requirements. If you receive marketing from us, we will keep your preferences until you unsubscribe or ask us to cease contact. Information about how our websites are used is only kept for as long as necessary to help us improve and maintain our websites and services.

Where required, information may be retained for longer periods in order to establish, exercise or defend legal claims, comply with legal obligations, or resolve disputes.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems within relevant time scales, and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances, we may anonymise your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

## **Your rights in connection with your personal information**

It is important that the personal information we hold about you is accurate and up to date. Please let us know if your personal information changes so that we can keep our records current.

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- request access to your personal information – this is usually known as making a data subject access request

and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it

- request rectification of your personal information – this enables you to have any inaccurate or incomplete personal information we hold about you corrected
- request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected
- restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy
- object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes

If you wish to exercise any of these rights, please contact the Data Controller. We may ask you to provide information to verify your identity before processing your request. We will respond as soon as possible and normally within one month, although this period may be extended where requests are particularly complex or numerous.

Where we rely on your consent to process personal information, you may withdraw that consent at any time by contacting the Data Controller. This will not affect any processing carried out before your consent was withdrawn. We will stop using your personal information for that purpose unless we are legally required to retain or process it.

If you believe that Clow Group Ltd. has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

## **How We Protect Personal Information When It Is Processed Outside the UK**

Some of our service providers, including website analytics providers, may process personal information outside the UK or European Economic Area. Where this occurs, we take reasonable steps to ensure that appropriate safeguards are in place and that personal information is protected in accordance with UK GDPR and the DPA 2018.

## **Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. Where significant changes are made, we may notify you directly where appropriate. The latest version will always be available on our website and the last updated date shown in this document indicates when the Privacy Policy was last updated.

## **Contact**

If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Controller at Clow Group Ltd., 185 Broad Street, Glasgow G40 2QR, or email [data.controller@clowgroup.co.uk](mailto:data.controller@clowgroup.co.uk).