

BROOKS BROS

FOR THE COMPLETE TIMBER SERVICE

Privacy Policy

This is policy version 309754.0002 which came into effect on 10/05/2018

About this policy

This policy describes how we use your personal data when you use our websites (<http://www.brookstimber.co.uk> and <http://www.brooksfloor.com>) or buy our goods or when we provide services to you. We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it, which are also explained.

You can read and print this whole policy or click on the links below to see specific information about:

[*Who we are and how you can contact us*](#)

[*What personal data we collect about you*](#)

[*What we use your personal data for*](#)

[*Cookies*](#)

[*When we need your consent to use your personal data*](#)

[*Personal data you are legally obliged to provide*](#)

[*Your rights to know what personal data we hold and to control how we use it*](#)

[*Automated decision making and profiling*](#)

[*When we will share your personal data with others*](#)

[*How we keep your personal data safe*](#)

[*How we use your personal data for marketing*](#)

[*When we will send your personal data to other countries*](#)

[*How long we keep your personal data*](#)

[*How you can make a complaint*](#)

[*How we keep this policy up to date*](#)

Who we are and how you can contact us

We are Brooks Bros. (UK) Limited, a company, with company number 01644146, registered in England and Wales. Our registered office address is at Blackwater Place, Blackwater Trading Estate, The Causeway, Maldon, Essex CM9 4GG.

You can contact us in writing at Blackwater Place, Blackwater Trading Estate, The Causeway, Maldon, Essex CM9 4GG or by emailing sales@brookstimber.co.uk. If you would like to speak to us please call us on 01621 877400.

Please refer to the sections ***Your rights to know what personal data we hold and to control how we use it*** and ***How to make a complaint*** for further contact information.

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What personal data we collect about you

We collect:

Personal data that you provide to us. There are lots of ways in which you may share your personal data with us, for example, you may purchase goods or services on our websites or you may contact us in connection with goods or services that you would like to buy, or have already bought, from us. The personal data that you provide to us may include your name, address, e-mail address and phone number, financial and credit card information.

Personal data that we receive from third parties. If we work with other businesses or use sub-contractors these parties may collect personal data about you which they will share with us. For example, we may receive details of your credit history from credit reference agencies.

Personal data about your use of our websites. This is technical information and includes details such as your IP address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, as well as details of how you navigated to our websites and where you went when you left, what pages or products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and any phone number used to call our customer service number.

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What we use your personal data for

We use your personal data in the following ways:

Personal data that you provide to us is used to:

- Provide you with the information, products and services that you request from us

- Provide you with marketing information in accordance with your marketing preferences (see the ***How we use your personal data for marketing*** section below)
- Manage and administer our business
- Review and improve our goods and services

Personal data that we receive from third parties is combined with the personal data that you provide to us and used for the purposes described above.

Personal data about your use of our websites is used to:

- Administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our websites to ensure that content is presented in the most effective manner for you and for your computer or mobile device
- As part of our efforts to keep our site safe and secure
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you

To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

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Cookies

Our websites use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our websites. For detailed information on the cookies we use and the purposes for which we use them see our **Cookie policy**.

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When we need your consent to use your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

- We are entering into and carrying out our obligations under a contract with you

- We need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights

In exceptional circumstances we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it at a later date.

Please refer to the section above on ***How we use your personal data for marketing*** to read about marketing consents.

Personal data you are legally obliged to provide

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our goods or services to you.

Your rights to know what personal data we hold and to control how we use it

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter “**Subject Access Request**” and send it to us by post or email using the details in the ***Who we are and how you can contact us*** section above.

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.

You also have rights in relation to the personal data we hold about you, which includes to:

- **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 a legitimate interest (or those 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 (see the ***How we use your personal data for marketing*** section below for further details). 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 scenarios: (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.

If you wish to exercise any of the rights set out above, please contact us by post or email using the details in the ***Who we are and how you can contact us*** section above.

Automated decision making and profiling

We do not make use of automated decision making.

We use profiling to assist us with making decisions regarding credit account applications.

You are entitled to ask that we do not use your personal data for profiling purposes. Please refer to the section above on ***Your rights to know what personal data we hold and to control how we use it*** for details on how to exercise your rights.

When we will share your personal data with others

We share your data with the following people in the day to day running our business:

- Any business partners, suppliers and sub-contractors we work with to provide you with goods or services that you have requested from us
- Advertisers and advertising networks (see ***How we use your personal data for marketing*** section below for more information)
- Analytics and search engine providers that assist us in the improvement and optimisation of our site
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you

We may also share your personal information with third parties on a one-off basis, for example, if:

- We sell or buy any business or assets (including our own), in which case we will disclose your personal data to the prospective seller or buyer of such business or assets

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 **website terms of use** or our **terms and conditions of supply-BUSINESS** / **terms and conditions of supply-CONSUMER** and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

How we keep your personal data safe

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- Only storing your personal data on our secure servers
- Encrypting any payment transactions made through our websites using SSL technology
- Ensuring that our staff receive regular data security awareness training

- Keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises
- Maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems
- Enforcing a strict policy on the use of mobile devices and out of office working

Please remember that you are responsible for keeping your passwords secure. If we have given you (or you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. Please do not to share your passwords with anyone.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our websites; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

How we use your personal data for marketing

We will add your details to our marketing database if:

- You make an enquiry about our goods or services
- You buy our goods or services
- You have told a third party that you would like them to pass us your contact details so that we can send you updates about our goods and services
- You have registered an account on our websites and have indicated during the sign up process that you are happy to receive marketing communications

We may send you marketing communications by email and telephone.

You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls)or you may ask us not to send you any marketing communications at all.

We may ask you to indicate your marketing preferences when you first register an account on our websites. You can check and update your current marketing preferences at any time by calling or emailing us using the details set out in the ***Who we are and how you can contact us*** section above.

We never share your personal data with third parties for marketing purposes.

When we will send your personal data to other countries

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**) by us or by our sub-contractors because many of our key suppliers are based outside the EEA. Where we, or our sub-contractors, use IT systems or software that is provided by non-UK companies, your personal data may be stored on the servers of these non-UK companies outside the EEA.

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

- We will only transfer 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 https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- 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 https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en].

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 https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en.

How long we keep your personal data

We only keep your personal data for as long as we actually need it. In practice this means that we will keep:

- Your name and contact details for seven years
- A record of the goods and services including a copy of your full customer file) we provide to you for seven years
- Complaint records for one years

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

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How you can make a complaint

If you are unhappy with the way we have used your personal data please contact us to discuss this using the contact details set out in the ***Who we are and how you can contact us*** section above.

You are also entitled to make a complaint to the Information Commissioner’s Office which you can do by visiting www.ico.org.uk. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner’s Office.

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How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our websites (<http://www.brookstimmer.co.uk> and <http://www.brooksfloor.com>) or you can contact us (see ***Who we are and how to contact us*** section above) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown at the beginning of the policy and the date on which that version of the policy came into force.