

Milwood Group Privacy Policy

Milwood Group and the protection of your data

The Milwood Group has always treated the collection, use and security of customer data as an important aspect of our customer relationships and business operation. We have many essential policies and practices in place that mean our customers can share their information with us, safe in the knowledge that it will be kept securely and not be sold on or misused.

The General Data Protection Regulation (GDPR)

In May 2018 the General Data Protection Regulation (GDPR) comes into force. This new legislation has given us the opportunity to review our approach to the use of customer data and to add more clarity and transparency to our process.

The GDPR is a Europe-wide directive that is designed to strengthen and unify data protection for all individuals within the European Union.

A key component of the GDPR is for organisations to decide which legal basis they will use to manage and process customer data. The Milwood Group has decided to use Legitimate Interest as our legal basis.

Legitimate Interest as a legal basis

As a result of a Legitimate Interest Assessment carried out by The Milwood Group, we are confident that we can use that as a legal basis to process customers data. Our policy for data processing is therefore that of Legitimate Interest (LI). Advice suggests that one legal basis should be chosen and stuck with to ensure a consistent approach and clarity for customers. In brief the reasons for choosing LI are:

- **Necessity** The processing activity is important because it allows the Milwood Group Data Controller to achieve the following functions and responsibilities
- **Balance** The processing is unlikely to have a negative impact on the individual's rights as it forms part of an expected commercial relationship with the contact and is used to add value, answer queries and provide information
- Maintain contact with existing customers and prospects to achieve business growth targets
- To keep customers informed of decking maintenance tasks
- To facilitate the swift resolution of customer service issues
- To manage guarantees and installation activities

The processing of email and mailing address data to complete these tasks is efficient, cost effective and swift, meaning we can manage data in an open and transparent way and deal with changes quickly.

It is highly unlikely that, given the commercial use, and the processes already in place in relation to collection, use and deletion, that the processing will cause any harm or distress to the individual.

From the start of the relationship and processing of data there is a transparent and expected approach to processing that is underpinned by good proactive management such as a clear Privacy Policy and easy to find unsubscribe options.

Both necessity and balance are key descriptions in the GDPR. The GDPR says, "the processing of Personal Data for direct marketing purposes may be regarded as carried out for a legitimate interest.' An organisation may wish to rely upon Legitimate Interests where Consent is not viable or not preferred and the Balance of Interests condition can be met."

The GDPR uses the phrase "may be regarded as...", so organisations will still need to ensure they can establish necessity and balance their interests with the interests of those receiving the direct marketing communications.

For More Information

If you are an existing customer of Milwood Group then you do need not to take any further action. If you want to withdraw from marketing communications then you can do that here: Email us to Unsubscribe

If you are new to Milwood Group then we advise you to read our Privacy Policy here and if you want to withdraw from marketing communication then you can do that here: Email us to Unsubscribe

For further information about Milwood Group and our approach to Customer Data Security please contact us: sales@milwoodgroup.co.uk. For further information about GDPR please visit the ICO website.

Privacy Policy

Milwood Group is a trading name of Able Canopies Ltd. Registered in England, company number 5391477.

Milwood Group House, 1, Europa & Jenner, 2 Trident Cl, Rochester, ME2 4ER

At Milwood Group, we are committed to protecting your privacy and information security. Please read this Privacy Policy carefully so that you are aware of the steps we take to protect your privacy, what information we collect, how we use it now or may use it in the future and what your rights are.

Controllers of Information

Any personal information provided here or gathered by our website is controlled by Milwood Group, at the address shown above.

We aim to process customer data and information provided by prospects in a fair and transparent manner. This document explains why we collect data, what we collect and how we use it. If you are unsure about how we are handling your information or you think we could improve our approach to data privacy please contact us using the information above.

What information do we collect? How do we use it?

When you use our website or the online publications published on our site and/or register information with us, we may collect, derive, combine, access, or otherwise process your personal information for the following purposes:

- The monitoring of customer traffic patterns and website usage to help us to develop the design and layout of the website
- Notifying you of Milwood Group news and information, which we think, may be of interest to you including by email or by physical mail, where you have granted us permission to do so
- Offering, administering and providing products and services
- Sending you surveys for quality management purposes

We may collect the following information:

- Name and job title
- Contact information including email address
- Demographic information such as postcode, preferences and interests
- Other information relevant to customer surveys and/or offers

Legal basis for processing your data

Under the requirements of the General Data Privacy Regulation (GDPR) we use the following legal basis for processing your data:

In the pursuit of our legitimate interests as a commercial organisation including the marketing and promotion of our brand, products, and services and to fulfil any contractual obligations we may have when you make purchases from us, such as guarantees.

We will never use your information in a way incompatible with this privacy notice. This will include amongst others:

- We will not put any information about you on general release nor will we sell such information
- We will not transfer personal data outside of the European Economic Area

Your consent

By using our website, you consent to the use of any information provided by you, collected from you, by Milwood Group for the purposes described in this privacy notice. You have a right to withdraw your consent at any time for any of the processing activities that are based on your consent, by sending us an e-mail to sales@milwoodgroup.com

Retention

We collect personal information for specific purposes and on specific legal bases and endeavour to collect only the personal information required for those purposes. Once this purpose has been fulfilled and the personal information is no longer required, we will anonymise your data by removing any identifiable information or erase it.

Your rights

You have the right to request, at reasonable intervals, access to the personal information we have collected about you. Please refer any access request to sales@milwoodgroup.com

When requesting access to your personal data please provide as much detail as possible about what personal data you would like access to and include in the subject line that it is in regard to an access request. For complying with your access request, we may ask you to provide us with evidence of your identity plus some additional information. We also reserve the right to charge for the cost of providing the information if it is deemed excessive.

If you so choose you may request us to rectify, erase or block the processing of your personal data if that personal data is no longer accurate, up-to-date or when the further processing of that personal date would be in violation of applicable data protection legislation.

You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means called a data portability request. You have the right to object to our processing of your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.

You have a right to information about how we are processing information about you and we have an obligation to processes only a minimum of data for specific, explicit and legitimate purposes in a fair, lawful and transparent manner. This privacy notice fulfils our obligations to provide you with information but you should contact us directly if you have any questions or concerns.

You have a right to lodge a complaint about any aspect of how we are handling your data with the Information Commissioner's Office in the UK who can be contacted here: <u>https://ico.org.uk/concerns/</u>

If you have questions regarding your privacy we are happy to discuss privacy and data protection with you. You may contact our us on sales@milwoodgroup.com

Security

We endeavour to take all reasonable steps to protect your personal data, including the use of encryption technology, but cannot guarantee the security of any data you disclose online. You accept the inherent security implications of sending information over the Internet and will not hold us responsible for any breach of security unless we have been negligent.

Applicable data protection law

This privacy notice has been based on the General Data Protection Regulation (GDPR). If you are subject to more stringent data protection legislation, please refrain from using this website or any of our other services.

Changes to this notice

We might periodically change this privacy notice. If we decide to change our privacy notice, we will post those changes on this page. We therefore recommend you re-visit this page periodically to check for changes.