

Privacy Policy

This Privacy Policy sets out how The Bathroom Brands Group of companies uses and protects any personal information that you provide The Bathroom Brands Group when you use our websites.

We provide this Privacy Policy to make you aware of our practices in connection with your privacy and of the choices you can make about the way personal information is collected and used.

We understand our imperative is to keep you as fully informed as possible about:

- The nature of the data we collect
- Why we collect this data
- About the ways in which we process data and how we use it
- Our intentions, procedures and actions, and the specific interests to which these relate

We understand it is our imperative to:

- Process data with the utmost accuracy and proficiency in relation to our specific, legitimate interests
- Respect your right to erasure if the processing is no longer relevant to these interests
- Correct any inaccurate information as soon as possible
- Ensure we secure information to the very best of our ability

The Bathroom Brands Group is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

The Bathroom Brands Group may change this policy by updating this page, and we recommend you visit our page from time to time. However, we will ensure that you are always fully informed and kept up to date about the ways in which we are currently collecting and processing your information and that you understand our most up-to-date policies and procedures. This policy is effective from 25 May 2018.

The EU GDPR 2018 places obligations on us to process your information fairly and lawfully and to communicate our obligations, interests, policies and procedures with clarity. For the purposes of GDPR, the data controller is **Crosswater Limited, Lake View House, Rennie Drive, Dartford, Kent DA1 5FU, UK.**

Records Management: what we collect and why we collect it

We collect the following information:

- Name and job title
- Contact information including email address
- Demographic information such as postcode, preferences and interests

We collect your data so that we can:

- Keep you up-to-date with our product range, new product offerings and any offers we may be promoting in relation to our products
- Fulfil orders for products you may place with us
- Make recommendations so that you, as our customer, can make the most appropriate commercial decisions
- Learn more about you, so that we can help you develop your business
- Build and foster the relationship between ourselves and you as a customer

Legitimate Interest and when we no longer need to hold your data

Our legitimate interest in the use of your data, and our processing of it, lies in protecting and enhancing the commercial, business and financial interests of our customers – and these interests only:

- There is no processing of data that is necessary outside of these interests, nor does processing take place outside of the relationship with our customers; this entails the immediate removal of personal data, once the purposes for its processing, i.e. the business relationship, is no longer considered by us to be active
- This remains the only pretext for processing, and we must ensure that our processes and procedures are proficient with respect to this, and the interests of our customers
- Our retention of data, and periods of retention, are specifically defined by these interests, but we nonetheless may exercise a maximum retention period in some circumstances, even if the business relationship is still active

Consent

From May 2018, if you are an individual or a business not established with a distinct legal personality, we will have sought your consent to gather, process, securely hold and share, to the limited extent necessary for the purpose of promoting the sale of our products, your personal data. This consent will have been secured by your agreeing the terms of use of our web-sites or explicitly by your placing an order for the supply of products with us for the first time or through email communication requiring you to proactively give consent according to our Privacy Policy.

How we handle your information

We will only use the information you provide to us as described in this Privacy Policy.

We will observe the rights granted to you under applicable privacy and data protection laws and will ensure that queries relating to privacy issues are promptly and transparently dealt with – and that you are fully aware of our most up-to-date policies, procedures and intentions. We will only collect your information where we have lawful grounds and

legitimate business reasons to do so. We will be transparent in our dealings with you and will tell you in full about how we will collect your information.

Data sharing and right of access: controlling your personal information

We may share information provided by you, either verbally or in writing, among the different companies forming the Bathroom Brands Group of companies or with third parties, such as recognised distributors of our products.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly review and correct any information found to be incorrect.

You may request details of personal information which we hold about you under the EU GDPR 2018. If you would like a copy of the information held on you please email us or write to us at **Lake View House, Rennie Drive, Dartford, Kent DA1 5FU, UK**, marked for the attention of the **Data Protection Officer**

What we do with the information we gather

We will use your information for:

- Internal record keeping – as far as we need to fulfil our obligations to a customer
- Improve our products and services
- Managing or developing our business interests as a supplier of bathroom furniture and fittings which specifically we consider our legitimate interests (see above)
- keep in touch where there is a legitimate interest to do so

How long we keep your information

We will have gathered and processed your personal data as a user of one or more of our web-sites, as a customer or as a member of the staff of one of our customers. GDPR recognises that we will therefore have an interest in retaining this as long as it remains a legitimate interest to do so.

Generally, however:

- We will keep the information that is necessary to enable us to provide a customer with a service or supply of products or if longer for so long as a customer is considered by us to be an active customer
- We will delete any personal information for which we no longer have a legitimate interest
- There may be a delay where we are unaware this legitimate interest has passed and we would ask that you inform us of a change in circumstance relevant to this. (EG You may leave your position and that may remove the legitimate interest upon which we previously stored your personal data)

Internet Privacy

This section explains our policy regarding any personal information you might supply to us when you visit our website.

Once you choose to provide us with personally identifiable information (any information by which you may be identified – see our definition below), by agreeing to the terms and conditions for our website, you can be assured that it will only be used to support your customer relationship with us.

Personal Data

We define personal data as information, separately and/or in combination, and either in isolation or arranged in such a way, that would lead to the unique identification of, and distinguishes, an individual: directly or indirectly.

Information Security

We are committed to ensuring that your information is secure as is practicable.

Unfortunately, the transmission of information and data via the internet is not completely secure – but we have put in place our best steps to assure security. In order to prevent

unauthorised access or disclosure, we have put in place the best possible physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Links to other websites

Our website may contain links to and from other websites. If you follow a link to any of these third party websites, please note that they will have their own privacy statements and we do not accept any responsibilities or liability for these statements.

Use of cookies

We use cookies on our website. Cookies are small data files that your browser places on your computer or device. A cookie itself does not contain or collect personal information about you or your use of the web. However, when you visit a website the cookies on your computer or device can enable the website to deliver a more tailored service or experience – for example, by remembering your username or preferences.

Why we use cookies

We use cookies in order to remember your preferences and to give you a better user experience by improving our website and for providing content more accurately suited to your needs.

This means we use cookies in order to remember your movement on and usage of our website. We do not collect personal data as part of this. We collect this statistical data so we can optimise our website.

Want to get rid of cookies or change your cookie settings?

Most browsers automatically accept cookies. You can prevent cookies from being stored on your computer or device by setting your browser to not accept cookies. Some browsers provide a mode where cookies are always deleted after a visit. The exact instructions for changing your cookie settings can be found in the 'Help' section of your browser. You can

delete cookies already on your computer or device at any time. If you choose not to accept cookies at all, you can still visit our website, however, when cookies are disabled, we cannot guarantee an optimum experience and there may be content that is not available.