

# GDPR DATA PRIVACY NOTICE

GEERINGS LTD (INCLUDING WALTER GEERING)

UPDATED AS AT 25 MAY 2018

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# 1. Introduction

The staff at Geerings Ltd are committed to protecting and respecting the privacy of your data. This Privacy Notice sets out Geerings Ltd's policy on data protection. It provides an overview of the data protection requirements under the General Data Protection Regulation (GDPR).

The document outlines the types of personal data Geerings collects about you, the purpose of it, how we'll store and handle that data, and keep it safe.

For the purposes of this document 'Geerings' also relates to one of its divisions trading as Walter Geering.

# 2. Definitions

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of controller.

**Data subject – Natural person**

**Categories of data:**

**Personal data**

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in Particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data**

The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing**

Means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party**

Means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### 3. Interpretation

**In this Privacy Notice:**

**The Data Controller is** Geerings Ltd, the Directors and Senior Managers.

**The Processors are** all members of staff at Geerings Ltd who collect and process data for Geerings Ltd.

**The Data subjects are** all customers, potential customers, suppliers, staff and contacts of Geerings Ltd.

### 4. Purpose and Legal basis

The law on data protection sets out six 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. 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.

#### **Legal compliance**

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

#### **Vital Interests**

The processing is necessary to protect someone's life

#### **Public Task**

The process is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

#### **Legitimate interest**

In specific 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.

## 5. Personal data collection

Personal data is collected;

- When you visit any of our websites, and use your account to buy products and services, on the phone and via email.
- When you make an online purchase and check out as a guest (in which case we just collect transaction-based data).
- When you create an account with us.
- When you purchase a product or service by phone but don't have (or don't use) an account.
- When you engage with us by telephone, email, fax or 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.
- When you choose to complete any surveys we send you.
- When you comment on or review our products and services.

## 6. Types of personal data collected

This may include your first name and surname, business organisation, position held, billing/delivery address, orders and receipts, email address, mobile number and landline number. It will include details of your interactions with us through our customer relationship management system, details of previously purchased products and services from Geerings Ltd and information gathered by the use of cookies in your web browser.

## 7. Use of personal data

Personal data is used for internal purposes only and is not shared with any third parties except where stated in this document.

We use the data to ensure we offer promotions, products and services that are most likely to interest you. The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

### **Personal data is used for the following reasons:**

- To enable Geerings to process orders made by customers and comply with our legal obligations.
- To enable Geerings to respond to queries and maintain our contractual and legal obligations to our customers and our legitimate interests in providing the best service and understanding how we can improve our service based on customers 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.

- Personal data is used to enable Geerings to tailor special offers, products, discounts and promotions. This is done on the basis of legitimate business interest. You are free to opt out of receiving such communication from us 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. These service messages will not include any promotional content. This is to ensure Geerings complies with its 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.
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content. We have a legitimate interest to do so as this helps make our products or services more relevant to you. You are free to opt out of receiving these requests from us at any time.

## **8. Personal data protection and security**

Geerings takes all appropriate steps to secure personal data. The company secures access to all transactional areas of our websites using 'https' technology. Access to personal data is password-protected, and data such as payment card information is secured by SSL encryption.

### **Staff supervision, awareness and training**

Geerings:

- Ensures that everyone managing and handling personal information understand that they are contractually responsible for following good data protection practice.
- Describes clearly methods of handling personal information.
- Arranges for appropriate training for everyone managing and handling personal information.
- Supervises appropriately all staff who manage and handle personal information.
- Ensures that staff deal with queries about personal information promptly and courteously.
- Conducts a regular review and audit of the way personal information is managed.
- Assesses and evaluates regularly methods of handling personal information.

## **9. Personal data retention period**

We only keep personal data 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 anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## 10. Sharing personal data

Geerings only shares personal data with third parties where necessary to fulfill our business and legal obligations. Such trusted third parties include delivery couriers, IT companies who support our website and other business systems and lease funding organisations (in relation to copier leasing only) Any information provided to third parties is restricted to only what is necessary for their specific purposes and we work closely with them to ensure that personal information is kept secure and protected.

It may be necessary for Geerings to share personal information with third parties in specific circumstances. This includes;

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may, from time to time, expand, reduce or sell Geerings, or any division within it and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

## 11. Your rights over personal data

### **An overview of your different rights**

- You have the right to request access to the personal data we hold about you. The request must be in writing. If we find the request to be manifestly unfounded or excessive, we reserve the right to charge an administration fee. All such requests will be actioned within 30 days.
- You have the right to request the correction of your personal data when incorrect, out of date or incomplete.
- You have the right to request that we stop using your personal data for direct marketing.
- Where we possess personal data on the basis of our legitimate interest, you may ask us to stop for reasons connected with your individual situation.
- 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.

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.

You can request a copy of any information about you that Geerings holds at any time, and to have that information corrected if it is inaccurate. To ask for your information, please contact;

### **PA to the Joint Managing Directors**

**Geerings Ltd,**

**Cobbs Wood House,**

**Chart Road,**

**Ashford,**

**KENT TN23 1EP**

Or email [privacy@geerings.co.uk](mailto:privacy@geerings.co.uk)

## **12. Preventing the use of personal data for direct marketing**

There are several ways you can stop direct marketing communications from us:

- Click the ‘unsubscribe’ link in any email communication that we send you. We will then stop any further emails from that particular division.
- If you have an account, contact us by telephone or email and request to change your preferences.
- If you do not have an account with us but you or someone in your organisation has given us your contact details and you no longer wish to be contacted by us or have your details stored on our system, please write to **PA to the Joint Managing Directors, Geerings Ltd, Cobbs Wood House, Chart Road, Ashford, KENT TN23 1EP**, and request for your details to be removed, and to receive no further personal contact.

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

## **13. Cookies**

Geerings Ltd. uses cookies on our websites ([www.geerings.co.uk](http://www.geerings.co.uk); [www.geeringshotelproducts.co.uk](http://www.geeringshotelproducts.co.uk)) which collect personal data. Our cookie policy is available on our websites.

## **14. Transfer of Data Abroad**

Geerings Ltd does not transfer personal data outside the EU.

## **15. Automated Decision Making**

Geerings Ltd does not use any form of automated decision making.

## **16. Further Processing**

If Geerings Ltd is required to process data for a new purpose not covered by this notice, a new Privacy Notice, to replace this version, will be issued and made available to all individuals.



## 17. Changes to our GDPR Data Privacy Notice

Any changes we make to our GDPR Data Privacy Notice in the future will be covered in an update, posted on our website and distributed where appropriate.

## 18. Contacting Geerings

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 the PA to the Joint Managing Directors, who will be pleased to help you:

- Email us at [privacy@geerings.co.uk](mailto:privacy@geerings.co.uk)
- Or write to us at **PA to the Joint Managing Directors, Geerings Ltd, Cobbs Wood House, Chart Road, Ashford, KENT, TN23 1EP**

## 19. 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)