

# Data Privacy Notice

## Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We may need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

## About us

Thorian Framing is the Data Controller. This means it is ultimately responsible for the personal data it holds.

Contact Address:

Thorian Framing

Two Saints Enterprise Centre

361 Millbrook Road West

Southampton

Hampshire

SO15 0HW

<http://www.thorianframing.co.uk>

## Explaining the legal bases we rely on

The law on data protection sets out a number of 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.

For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

### Contractual obligations

We need your personal data to comply with our contractual obligations.

For example, if you order an item from us, we'll collect your address, a contact phone number and email address if possible, so we can keep you updated on the progress of your order.

### Legal compliance

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

For example, we can pass on details of people involved in fraud or other criminal activity affecting Thorian Framing to law enforcement.

## **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.

We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand, or develop new products/services.

## **When do we collect your personal data?**

- When you visit our website and use the contact form.
- When you place an order with us online, by post, phone, in store and email.
- When you contact us by any means with queries, complaints etc.
- When you enter prize draws or competitions.
- When you comment on or review our products and service.

## **What sort of personal data do we collect?**

- When you place an order with us: your name, address, orders, email address and telephone number.
- Details of your interactions with us by phone to our customer services or on-line.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, voucher redemptions.

- Information gathered by the use of cookies in your web browser. Learn more about how we use cookies in our Cookie Policy.
- Your comments and product reviews.

## **How and why do we use your personal data?**

We want to give you the best possible customer service.

We use the data to offer you 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.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.

## **Here's how we'll use your personal data and why:**

- To process any orders that you make via our website or in our shop. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

For example, your details will be needed so that we can inform you when your order is ready and we will keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect visitors, premises, assets and staff from crime, CCTV systems are in use within the car park area and record images for security.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the individuals we interact with from criminal activities.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you.

For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our 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 comply with our contractual or legal obligations to share data with law enforcement.

For example, when a court order is submitted to share data with law enforcement agencies or a court of law.

- With your consent, we will use your personal data, preferences and details of your orders to keep you informed by email about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on. Of course, you are free to opt out of hearing from us at any time.
- To send you survey and feedback requests to help improve our service. These messages will not include any promotional content and do not require prior consent when sent by email. We have a legitimate interest to do so as this helps improve our products or service we provide you with. Of course, you are free to opt out of receiving these requests from us at any time by contacting us at the address above.

## **How we protect your personal data**

We know how much data security matters to all our customers. With this in mind we undertake to treat your data with the utmost care and take all appropriate steps to protect it.

Personal data are stored in electronic and hard copy formats. Electronic records are protected by encryption, anti-virus technologies and backed up using encrypted cloud based

services. Hard copies of Invoices and work tickets are shredded within 30 days of you receiving your order and your account is clear of any monies due whichever is later.

We shall endeavour to use secure access to our complete website including any transactional areas of our website using 'https' technology.

Sensitive data such as payment card information is not stored by us. Payments are processed through the card processing company - izettle. How izettle process your data can be viewed here. <https://www.izettle.com/gb/help/articles/2258543-how-izettle-processes-contact-details-of-cardholders>.

izettle are

“EMV approved and comply with the Payment Card Industry Data Security Standard, PCI DSS. All data traffic is encrypted and no information is ever stored on the device or on the iZettle chip-card reader.”

We endeavour to monitor our system for possible vulnerabilities and attacks.

### **How long will we keep your personal data?**

Whenever we collect or process your personal data, we'll only keep it 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.

An example of customer data retention period:

Orders

When you place an order, we'll keep the personal data you give us electronically for up to six years from your previous order so we can comply with our legal and contractual obligations. Hard copies of Invoices and work tickets are shredded within 30 days of you receiving your order and your account is clear of any monies due whichever is later.

### **Who do we share your personal data with?**

We share your personal data with trusted third parties.

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems.
- MailChimp who help us manage our email communications with you.
- Izettle who process card payments.
- Debt recovery agents
- Ombudsmen and regulatory authorities, such as the Fine Art Trade Guild.

## **Sharing your data with third parties for their own purposes**

We will only do this in very specific circumstances, for example:

- 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 also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- For further information please contact our Privacy Officer at Thorian Framing

## **Where your personal data may be processed**

Sometimes we may need to share your personal data with third parties outside the European Economic Area (EEA), such as Australia or the USA. The third parties involved would be involved in the delivery of services to our customers outside the EEA.

When we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA.

For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Privacy Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## **The rights of the people whose data we process**

- The people whose personal data we are processing have the following rights that are applicable to our business:
  - To be informed – they have a right to be told that we are processing their data. This right however does not apply if they already have the information we are processing or being informed would 'render impossible or seriously impair' our purposes for processing it (eg for the recovery of debt)
  - Access – they have a right to confirmation that we are processing their data, a copy of their personal data and other supplementary information
  - Rectification – they have a right to have inaccurate personal data corrected
  - Erasure – they have a right to have their personal data erased, providing there are no reasons for this right not to apply (eg for the establishment, exercise or defence of legal claims)
  - Portability – they have a right to obtain and reuse their personal data for their own purposes across different services
  - To object – they have the right to object to the processing of their personal data in certain circumstances

If you want exercise any of your rights please contact us via the contact page of this website

## **Checking your identity**

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. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

### **How can you stop the use of your 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 us.
- Write to customer services to add or remove you from our mailing list.

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

### **Complaints**

- If you have any questions, requests or concerns about our use of your data please contact our Privacy Officer at the address given in our About Us section above.
- If you've already told us we need to do something, but we haven't responded in a way that you're satisfied with, you can complain to the Information Commissioner's Office (the ICO).
- It's easiest to do this online via the ICO website (<https://ico.org.uk/concerns/handling/>), but you can also do so in writing to:

The Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

### **Cookie Policy**

Thorian Framing Website uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping baskets, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at [the About Cookies website](#) which offers guidance for all modern browsers.