

## 1. INTRODUCTION

Benson Signs respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice applies to information we collect about:

- Visitors to our website;
- Visitors to our premises;
- Customers (current and past);and
- Suppliers (current and past).

## 2. IMPORTANT INFORMATION AND WHO WE ARE

### 2.1 Controller

Chris Benson Signs Limited is the controller and responsible for your personal data (collectively referred to as "Benson Signs", "we", "us" or "our" in this privacy notice).

Our full details are:

**Full name of legal entity:** Chris Benson Signs Limited

**Email address:** info@benson-signs.co.uk

**Postal address:** 96-98 Great Howard Street, Liverpool, L3 7AX

**Telephone number:** 0151 298 1567

### 2.2 Changes to the privacy notice and your duty to inform us of changes

This version was last updated on May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 3. THE DATA WE COLLECT ABOUT YOU

### 3.1 What is personal data?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes your name and title.
- **Contact Data** includes any billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

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- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from, or supplied to, us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We are unlikely to collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), but we may be required by law to collect health data should you be injured in an accident at our premises or as a result of any accident involving our employees.

We do not collect any information about criminal convictions and offences.

## 3.2 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 4. HOW IS YOUR PERSONAL DATA COLLECTED AND USED?

We use different methods to collect data from and about you including through:

### 4.1 Online

#### (a) Visitors to our website

When you visit our website, we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the websites as part of our Legitimate Interest to improve our website. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our websites.

You may decide to submit personal information to us through the website, for example when using our 'contact us' form. When we collect personal data in this way this policy sets out what we intend to do with it.

Our website is not intended for children and we do not knowingly collect data relating to children.

#### (b) Cookies

**Please see weblink below to understand our use of gtag.js & analytics.js**

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

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## (c) Security and performance

To maintain the security and performance of our websites we may use a third party service which processes the IP address of visitors and other Technical Data. This information is retained for a maximum period of one year, and is used to review the security and performance of our website as a Legitimate Interest.

## (d) Social Media

If you send us a private or direct message via social media we may download copies of your message onto our internal systems if appropriate.

## 4.2 Direct interactions

We may collect personal information from our direct interactions with you. This may include through correspondence, telephone calls, attendance at meetings with you, or other direct interactions.

## 4.3 Data received from third parties

We may from time to time use credit reference agencies to obtain credit reports prior to granting credit accounts. This information is solely used for such purposes and is kept for a maximum period of five years.

## 5. CUSTOMERS

We will process your personal information for the Performance of the Contract, and also under our Legitimate Interest in retaining information about our Customers, to administer our business, provide support and further to continue to deliver quality products to our customers.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

We will also keep your purchase history information for the duration of any warranty period applicable to the goods and/or services purchased, which may be in excess of the period stated above.

## 6. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### 6.1 Promotional offers from us

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing. We do not use marketing campaigns and so any marketing material will be on an ad hoc basis and aimed at products, services or events that we think you would be interested in.

### 6.2 Third-party marketing

We do not share any personal details with third parties for marketing purposes.

### 6.3 Opting out

You can ask us to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## 7. SERVICE DEVELOPMENT

We use aggregated, anonymised data to develop our website, services and products, but we may from time to time use your personal data, including feedback and other information provided by you to improve our service.

We may also use personal information that you have provided (including your communications with us) to offer customer support to you and fix problems.

## 8. SUPPLIERS AND THIRD PARTIES

We will retain contact details of suppliers and other third parties that we have done, or may do, business with in the future. We do not hold these records indefinitely and they are reviewed annually. We believe that it is in both our and your Legitimate Interest to hold these details so that we may remain in touch.

If you apply for a job with us, then your information will be held in accordance with our separate privacy notice for job applicants. We will send you a copy of this when we receive your application.

## 9. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 10. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out above. These parties may be:

- Logistics providers (acting as processors) organising the delivery of your goods
- Service providers (acting as processors) who provide IT and system administration services and support.
- Professional advisers (acting as processors or joint controllers) including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities (acting as processors or joint controllers) based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or

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merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow any third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 10.1 International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

## 11. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 12. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are summarised below:

### 12.1 Request access to your personal data (commonly known as a "data subject access request")

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

### 12.2 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.

### 12.3 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.

### 12.4 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 may object to our processing of your personal data. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

## 12.5 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.

## 12.6 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.

## 12.7 Withdraw consent at any time

Where we are relying on consent to process your personal data you may withdraw this consent at any time. 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.

## 12.8 How to exercise your rights

If you wish to exercise any of the rights set out above, please contact us.

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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 12.9 Your right to complain to the Information Commissioner's Office

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 13. GLOSSARY

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate

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interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.