

# **Glen Dimplex Home Appliances Privacy Notice**

Welcome to the Glen Dimplex Home Appliances Privacy Notice ("**Privacy Notice**").

This Privacy Notice explains how we collect, use, disclose and protect your Personal Data and respect any rights you benefit from under law.

Your Personal Data is controlled by Glen Dimplex Home Appliances (GDHA) part of the Glen Dimplex Group.

When we refer to "we", "us" and "our" in this notice it means GDHA (including its Brands; Belling, Stoves, Lec, Valor and Britannia).

When we say "you" and "your" and "individuals" in this notice, we mean anyone whose Personal Data we may collect.

GDHA's registered office is Stoney Lane, Prescot , Merseyside , L35 2XW

For more information about us, our local companies, our brands and our presence in your jurisdiction, please visit [www.gdha.com](http://www.gdha.com)

## **1. How we obtain your Personal Data**

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### **Personal Data collected directly from you**

We may collect personal data from you directly from various sources including:

- Anyone who order goods or services from us either via our website, telephone, email, SMS, live chat or social media;
- Anyone who enters a competition or promotional survey
- Anyone who corresponds with us for any reason e.g. making a complaint
- Anyone who registers their product warranty
- Anyone who visits our website
- Anyone who has a business relationship with us

### **Personal Data collected automatically**

Some Personal Data may be collected automatically when you visit or use our Sites (and those of our third-party service providers acting on our behalf), such as data collected by cookies and other technologies (such as web analytic tools and pixel tags) on our websites. Please also consult our **Cookies Policy** for more information on how we make use of cookies and other automated means of data collection.

Personal Data collected automatically may include:

- information about your (mobile) device or your type of browser
- information about the way you use our websites, such as details of the web pages you have viewed, the banners and the hyperlinks you have clicked, etc.
- whether you have opened e-mails sent by us to you
- the websites you have visited before arriving at one of our websites

- your IP address
- the hyperlinks you have clicked
- your MAC address
- information you choose to share by using social media tools incorporated in our websites or using your social media log-in details to access certain GDHA product sites or applications; and
- information you share with us about your location. Where we are required to do so by local law, we will only use that information where you have agreed that we can

### **Personal Data obtained from other sources**

We may also collect Personal Data about you from other sources.

These other sources may include:

- our trusted business partners
- social media sites
- consumer research organisations
- credit reference agencies
- other members of our group

## **2. Type of Personal Data we collect**

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The table below sets out the different types of personal data that we collect and the sources we collect it from.

<b>Category</b>	<b>Types of personal data</b>	<b>Collected from</b>
<b>Contact Information</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Telephone number</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Your organisation</li> <li>• Retailer or insurance provider booking service call on your behalf</li> </ul>
<b>Billing Information</b>	<ul style="list-style-type: none"> <li>• Your payment details when purchasing products and services from us</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>
<b>Browsing and Device Usage Information</b>	<ul style="list-style-type: none"> <li>• Information automatically generated through your use of our websites and other digital platforms</li> <li>• IP address</li> </ul>	<ul style="list-style-type: none"> <li>• You and your use of our digital platforms</li> </ul>

- Information revealing the location of your electronic device
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### 3. How we use your Personal Data

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We use Personal Data for the following business purposes:

- to provide aftersales services including repairs to any of our products that you have purchased from one of our retail partners
- to offer spare parts and accessories for you to purchase for your product
- to manage our business, conduct market research and manage our relationships with business partners to meet the legitimate needs of our business
- to send marketing information about our products and services if we have received your specific consent
- To arrange and provide delivery services for your purchases

There is no obligation to provide us with Personal Data, but we cannot provide our products and services without it.

Anyone whose personal data we hold has the right to object to us using it.

They can do this at any time by telling us and we will consider the request and either stop using their personal data or explain why we are not able to. Further details can be found below.

## 4. Lawful processing of personal data

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Under data protection law we must always have a “lawful basis” for processing your personal data. The Personal data purposes table below sets out the purposes for which we process the different categories of your Personal Data and the corresponding lawful basis for that processing. For some processing activities, we consider that more than one lawful basis may be relevant, depending on the circumstances.

<b>Purpose of processing</b>	<b>Lawful Basis</b>
<b>Responding to your enquiries</b>	<ul style="list-style-type: none"><li>• To perform a contract</li><li>• For our legitimate interests (It is important that we can respond to your enquiries)</li></ul>
<b>To arrange a service call</b>	<ul style="list-style-type: none"><li>• To perform a contract</li></ul>
<b>Taking payment from you in respect of our services</b>	<ul style="list-style-type: none"><li>• To perform a contract</li></ul>
<b>Arranging delivery of products and spare parts</b>	<ul style="list-style-type: none"><li>• To perform a contract</li></ul>
<b>Sending you direct marketing communications</b>	<ul style="list-style-type: none"><li>• Your consent</li><li>• For our legitimate interests (We would like to send you information on other products and services we think you would be interested in, where the law allows)</li></ul>
<b>Analysing how our electronic marketing communications are used by you (including whether you open them and click through to access their contents)</b>	<ul style="list-style-type: none"><li>• For our legitimate interests (We need this information to ensure we are providing you with information that you are interested in)</li></ul>
<b>Conducting surveys for benchmarking, continuous improvement and marketing purposes</b>	<ul style="list-style-type: none"><li>• Your consent</li><li>• For our legitimate interests (We need to collect your feedback in relation to our services, in order to resolve any problems or complaints and improve and innovate)</li></ul>

**For our general record-keeping**

- To perform a contract
- To comply with a legal obligation

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**Managing our business relationship with you**

- To perform a contract
- For our legitimate interests (We need to be able to try and maintain our position of being your trusted advisor and resolve any complaint or dispute you might raise with us)

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**Performing identity, financial and credit searches**

To comply with a legal obligation

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**Monitoring our systems and processes to identify, record and prevent fraudulent, criminal and/or illegal activity**

- To comply with a legal obligation
- For our legitimate interests (We need to be able to monitor our systems in this way to help protect them, us and you from illegal activity)

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**Complying with instructions, orders and requests from law enforcement agencies**

- To comply with a legal obligation

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**Obtaining legal advice, establishing, defending and enforcing our legal rights and obligations**

- For our legitimate interests (We must be able to establish and defend our legal rights and understand our obligations, and seek legal advice in connection with them)

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**Complying with our general regulatory and statutory obligations**

- To comply with a legal obligation

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**Managing the proposed sale, restructuring, transfer or merging of any or all part(s) of our business.**

- To comply with a legal obligation
- For our legitimate interests (We have a legitimate interest in being able to sell any part of our business)

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**Monitoring and producing statistical information regarding the use of our platforms**

- For our legitimate interests (We need to perform this routine monitoring to make sure our platforms work properly, analyse how they are used and improve them) (We have a legitimate interest in being able to sell any part of our business)
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## 5. Sharing your personal data

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### **Intra group data sharing**

Sometimes we share your Personal Data with other companies within The Glen Dimplex Group for the purposes set out in this Privacy Notice.

For more information about us, our companies, our brands and presence in your jurisdiction, please visit [www.glendimplex.com](http://www.glendimplex.com)

### **Third-party service providers**

We also ask trusted third-party service providers to carry out certain business functions for us. In order to do this, we may need to share your personal data

These include:

- IT support, cloud platform and data hosting providers who help us with the operation of our websites, mobile applications, data rooms, document and workflow management systems and other systems and applications;
- marketing service providers, including companies who send out surveys and marketing communications on our behalf
- product review providers who help collate customer feedback for us;
- Insurance partners who underwrite extended warranties on our products
- Logistics partners who provide home delivery services
- Service partners who provide after sales product repairs

We have agreements in place with these business partners which will restrict how they are able to process your personal data and ensure appropriate levels of security are applied by them.

### **Acquisitions**

If another company acquires (part of) our company, business, or our assets, that company may acquire all or part of the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Notice. In the unlikely event of an insolvency, bankruptcy or receivership, your Personal Data may also be transferred as a business asset, subject of applicable law.

### **Disclosure**

We may disclose your Personal Data if we believe in good faith that such disclosure is necessary for our legitimate interest or prudent considering our obligations under applicable law:

- regulatory bodies and law enforcement agencies, where necessary for any investigations or to respond to enquiries in relation to our compliance with applicable law.
- professional advisors (such as third-party law firms) and other third parties in connection with our legitimate business activities.

These organisations may use your personal data as a “controller” – they will have their own privacy notices which you should read, and they have their own responsibilities to comply with applicable data protection laws.

To obtain a full list of all third parties your personal data is shared with please contact [dataprivacy@gdha.com](mailto:dataprivacy@gdha.com)

## 6. Transferring your personal data outside of the UK

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Your Personal Data may be transferred to and processed in other countries. We may use servers located in the European Union (EU) to store Personal Data where it is protected by laws equivalent to those in the UK.

We may transfer Personal Data to other members of the Glen Dimplex Group inside the EU. We have put in place appropriate safeguards to protect your personal data in the event of these transfers.

Some of our suppliers have servers outside the UK. Our contracts with these suppliers require them to provide equivalent levels of protection for Personal Data.

If you would like to see a copy of any relevant safeguards used by us to protect the transfer of your personal data, please contact [dataprivacy@gdha.com](mailto:dataprivacy@gdha.com).

## 7. How we keep your personal data secure

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We will put in place appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

When collecting or transferring Sensitive Personal Data we use a variety of additional security technologies and procedures to help protect your information.

The Personal Data you provide us with is stored on computer systems located in controlled facilities which can only be accessed by a limited number of persons who have a need to know in order to carry out their tasks and any services requested by you.

When we process highly confidential information (such as credit card numbers) over the Internet, we protect it using encryption.

However, it should be noted that we cannot guarantee the security of personal data you submit to us online. Transmission of data over the internet is at your own risk.

## 8. How long we keep your personal data

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We will only retain your personal data for a limited period, and for no longer than is necessary for the purposes for which we are processing it for as set out in this Privacy Notice or otherwise to comply with legal or regulatory requirements applicable to us.

When your Personal Data is processed:

- for the performance of your contract with us, we retain your Personal Data for a period of 6 years following completion of a contractual order
- for meeting, legal and regulatory requirements, we retain your Personal Data as it is set out by the applicable law; and

In all other cases, we process your Personal Data, depending on the type, for up to 10 years from the date of our last interaction with you.

You can request a copy of our personal data retention schedule by contacting [dataprivacy@gdha.com](mailto:dataprivacy@gdha.com)

## 9. Your rights

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You have various rights in relation to your Personal Data:

- Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to do this, we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know.
- Where our processing of your personal data is based on **legitimate interests**, you can object to this processing at any time. If you do this, we will need to give you a valid reason why our processing should continue, which overrides your interests, rights and freedoms.
- Where we are processing your personal data for **direct marketing** purposes, you have the right to object to that processing.

Any individual whose Personal Data we hold has several rights in relation to how that information is processed by us. You have the following rights:

- **The right to object** – individuals can object to us processing their data and we will either agree to stop processing or explain why we are unable to
- **The right of access** – individuals can request a copy of their Personal Data we hold, subject to certain exemptions (a subject access request)
- **The right of rectification** – individuals can ask us to update or correct their Personal Data to ensure its accuracy
- **The right to be forgotten** – individuals can ask us to delete their Personal Data from our records if it is no longer needed for the original purpose
- **The right of restriction** – individuals can ask us to restrict the processing of their Personal Data in certain circumstances
- **The right to data portability** – individuals can ask for a copy of their Personal Data, so it can be used for their own purposes.

In addition, in certain circumstances we may process your personal data through automated decision-making, including profiling. You have the right to object to a decision that we make which is based solely on automated processing of your personal data.

You can exercise these rights by notifying any member of staff at GDHA. However, the most efficient way for us to handle your request is via our Data Privacy team.

You can contact them at [dataprivacy@gdha.com](mailto:dataprivacy@gdha.com).



## **Complaints**

You also have **the right to make a complaint** – individuals can complain if they feel their Personal Data has been mishandled. We encourage individuals to come to us in the first instance, but they are entitled to complain directly to the Information Commissioner's Office (ICO) [www.ico.org.uk](http://www.ico.org.uk)

## **10. Children**

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Our Sites are not directed towards children and we request that children below the age of 16 do not provide Personal Data through our Sites.

If you are the parent or legal guardian of a child under 16 who has registered on one of our Sites, or who you believe has otherwise provided Personal Data to us, please contact us using the details set out at "how to contact us" below to have the information deleted.

## **11. How to contact us**

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We welcome your feedback. If you have any comments, questions or complaints regarding this Privacy Notice or our processing of your Personal Data, would like to contact our Group Data Protection Lead, or exercise any of the rights set out above, you can contact us on the following number or by sending an e-mail.

**Phone:** 0344 248 4591

**Email:** [dataprivacy@gdha.com](mailto:dataprivacy@gdha.com)

You may also write to us at:

**Address:** Data Protection Lead, Glen Dimplex, Stoney Lane, Prescot, Merseyside, L35 2XW

## **12. Changes to our Privacy Notice**

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This Privacy Notice was last updated in February 2021. This document is a notice to you and not a contract between us.

Occasionally it may be necessary to make changes to this notice. When that happens, we will provide an updated version at the earliest opportunity. Where changes are material, we will take steps to let you know. The most recent version will always be available on our website

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