

## General Data Protection Regulation Privacy Statement 3<sup>rd</sup> May 2018

### Introduction

Total Glass Limited are committed to ensuring that your privacy is protected. Information which you provide to us will be used only in accordance with this privacy statement. We do update this Policy, so please review regularly. You should check this information which is obvious on our web site [www.totalglass.com](http://www.totalglass.com) from time to time to ensure that you are happy with any changes.

Your personal data is information which is about you. It can be data that directly identifies you or data that can be put together with other data to identify you. We are Total Glass Limited and are the data controller. This data protection statement tells you how we'll use your personal data. Should you have any queries with regards to information we use then please contact Total Glass Limited, Total Complex, Overbrook Lane, Knowsley Business Park, Knowsley, Prescot L34 9FB.

### The types of personal data we collect and use

When you apply to open a trading account with us, we'll use your personal data for the reasons set out below and if your account is opened we'll use it to run your account.

Under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered - but if we do, we will notify you at the time. You're free at any time to change your mind and remove your consent. The result might be that we can't do certain things for you.

We'll collect most of this personal data from you when you apply but some personal data may be collected from other sources.

These are listed below.

The personal data we use may include:

1. Full name and personal details including contact information (e.g. home address and address history, email address, home and mobile telephone numbers);
2. Date of birth and/or age (e.g. to make sure that you're allowed to apply for an account or service);

### Financial details

1. information from credit references, electoral roll, court records of debt judgements and bankruptcies and other publicly available sources as well as information on any financial associates you may have (where relevant).

2. Personal data about other people named on your application. They must have agreed for you to give us their personal data and you must have shared this data protection statement with
3. them beforehand together with details of what you've agreed on their behalf providing your personal data
4. Other information relevant to customer surveys and/or offers

We'll tell you if you have a choice over providing some personal data, including if we ask for your consent to use it. Where we don't give you a choice and it is not optional, you must give us your personal data so we can manage your application.

#### **What do we do with the information we gather?**

1. Internal record keeping – including updating where necessary
2. We may use the information to improve our products and services.
3. We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

#### **Based on your consent, e.g.:**

- a) When you ask us to disclose your personal data to other people or organisations such as a company with whom you wish to open a trading relationship, a company handling a claim on your behalf, or otherwise agree to disclosures;
- b) To send you marketing communications where we've asked for your consent to do so.

#### **Sharing of your personal data**

If the relevant data protection law allows, we may share your personal data with:

1. Companies acting on our behalf and other people who help us provide our products and services;
2. Companies and other persons providing services to us;
3. Our legal and other professional advisors, including our auditors;
4. Other organisations who use shared databases for income verification and affordability checks and to manage/collect money owed;
5. Government bodies and agencies in the UK and overseas (e.g. HMRC who may in turn share it with relevant overseas tax authorities and with regulators e.g. the Prudential Regulation Authority, the Financial Conduct Authority, the Information Commissioner's Office);

6. Courts, to comply with legal requirements, and for the administration of justice;
7. In an emergency or to otherwise protect your vital interests;
8. To protect the security or integrity of our business operations,
9. To other parties linked with your account e.g. guarantors and other people named on the original trading application,
10. Should Total Glass Limited restructure or sell our business or its assets or have a merger or re-organisation;
11. Market research organisations who help to improve our products or services;
12. Payment systems (e.g. Visa or MasterCard) to operate your account and for regulatory purposes, to deal with transactions,
13. Anyone else where we have your consent or where it is required by law.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

## **How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst

visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Total Glass Limited – Employees**

Employees' personal data is kept safe, secure and up to date by Total Glass Limited and includes the following information:-

1. Name
2. Address
3. Date of birth
4. Sex
5. Education and qualifications
6. Work experience
7. National Insurance number
8. Tax code
9. Details of any known disability
10. Emergency contact details

Other information which Total Glass Limited will retain:

1. Employment history with the organisation
2. Employment terms and conditions (eg pay, hours of work, holidays, benefits, absence)
3. Any accidents connected with work
4. Any training undertaken
5. Any disciplinary action

Total Glass Limited will inform their employees of the following:-

- a) What records are kept and how they're used
- b) The confidentiality of the records
- c) How these records can help with their training and development at work

If an employee asks to find out what data is kept on them, Total Glass Limited will have 40 days to provide a copy of the information.

Should an employee leave Total Glass Limited they (Total Glass Limited) will not keep personal data of that employees any longer than is necessary and they will follow the rules on data protection

The GDPR provides the following rights for individuals:

#### **1. The right to be informed**

Total Glass Limited will provide individuals with information including: your purposes for processing their personal data, your retention periods for that personal data, and who it will be shared with. This is referred to as 'privacy information'.

#### **2. The right of access**

The right of access allows individuals to be aware of and verify the lawfulness of the processing:-

- a) confirmation that their data is being processed;
- b) access to their personal data; and
- c) other supplementary information – this largely corresponds to the information that should be provided in a privacy notice

### **3. The right to rectification**

The GDPR includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete.

### **4. The right to erasure**

The GDPR introduces a right for individuals to have personal data erased. The right to erasure is also known as ‘the right to be forgotten’.

Individuals can make a request for erasure verbally or in writing. Total Glass Limited then have one month to respond to a request.

The right is not absolute and only applies in certain circumstances.

### **5. The right to restrict processing**

Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances.

When processing is restricted, Total Glass Limited will be permitted to store the personal data, but not use it.

An individual can make a request for restriction verbally or in writing. Total Glass Limited then have one calendar month to respond to a request.

### **6. The right to data portability**

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.

It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.

### **7. The right to object**

Individuals have the right to object to:

- a. Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- b. Direct marketing (including profiling); and
- c. Processing for purposes of scientific/historical research and statistics.

### **8. Rights in relation to automated decision making and profiling.**

Total Glass Limited can only carry out this type of decision-making where the decision is:

- a. necessary for the entry into or performance of a contract; or
- b. authorised by Union or Member state law applicable to the controller; or
- c. based on the individual’s explicit consent.

Total Glass Limited will identify whether any of your processing falls under Article 22 and, if so, make sure that you:

- a. give individuals information about the processing;
- b. introduce simple ways for them to request human intervention or challenge a decision;
- c. carry out regular checks to make sure that your systems are working as intended.