# **Privacy Policy**

# Black Steel Doors Ltd 9 Milton Road, Sutton, United Kingdom, SM 2QR

## **Privacy Policy**

This Privacy Notice takes effect on 22 March 2021.

We care about our customers and know that your privacy is important to you. This Privacy Notice is our way of telling you how we collect your information, why we need it, and how we use it. For our website https://www.BlackSteelDoors (the "Site") and users of our mobile application (the "App") in the UK, and for information otherwise collected under this Privacy Notice, Black Steel Doors Ltd is the data controller that is responsible for your privacy. Black Steel Doors Ltd is located at. 9 Milton Road, Sutton, SM1 2 QR, United Kingdom.

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## **Scope of Application**

This Privacy Notice applies to your use of the Site and the App. If you visit another website, including another Black Steel Doors Ltd website, the privacy policy of that website will apply. Please review that website's privacy policy to understand how that website operator processes your information. This Privacy Notice also applies to the information you provide to us after being presented with or directed to this Privacy Notice. This could be, for example, when you share your information with our call center representatives or send us a letter via postal mail.

# Information We Collect and How We Use Your Information

There are three general categories of information we collect: (1) Information you give to us; (2) Information we automatically collect from your use of the Site or the App; (3) Information we collect from third parties. We use your information in several different ways. What we do with your information depends on when we collect it and what we collect. We may anonymize your information for any purpose permitted by applicable laws.

#### Information you give to us

- ✓ Your name and contact details (such as your email address, mailing address, phone number and password)
- ✓ Additional profile information (such as date of birth, gender, location and preferred language)
- ✓ Your payment information (such as your credit/debit card number, security/CVV code, and expiration date)
- ✓ Your financing information (such as employment and income)
- ✓ Your communications and contact history with us (such service call recordings, chat and instant messages, or communications with our social media channels)
- ✓ Other information (such as product reviews, forum posts, survey responses, participation in promotions, and other user-generated content)

How we use information	Why we collect it
you give to us	
Registration	We need your name and contact details to
	create your account. This information is
	necessary for the adequate performance of
	certain services and offerings on the Site
	and the App, and to fulfill our contract with
	you when you place an order.
Accept payment, fulfill	We use your name and contact details to
orders, provide refunds	fulfill our contract with you and deliver your
	orders, and we use your payment
	information to process payments and
	comply with applicable law.
Application for financing	We collect your financing information on
solutions offered by	behalf of the financing provider you choose
financing providers	and send the information to that financing
	provider to facilitate your application to
	financing products.

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Sending you account	We need your name and contact details to
information	deliver important account information to
	you, such as order confirmations and
	notices, changes to account, settings, and
	notices about the Site, the App, or the
	terms and policies that apply to them.
To offer an improved	We use your communications and contact
user experience	history with us, as well as other information
	such as additional profile information, to
	operate, protect, improve and optimize the
	Site and the App and to personalize and
	customize your experience. We have a
	legitimate interest in improving the Site
	and the App, as well as user experience.
Analytics, training and	We may use information you provide to us
quality assurance	to train our staff, improve our services, and
	perform other internal analytics and
	performance monitoring. This processing
	can be pursuant to your consent or
	pursuant to our legitimate interest in
	detecting and preventing fraud and
	improving our services and offerings.
Communication, marketing	We may use information you provide to us
and advertising	to deliver and personalize our
	communications with you, or to administer
	referral programs, rewards, surveys,
	sweepstakes, contests or other
	promotional activities. This processing can
	be pursuant to your consent or pursuant to
	our legitimate interest in undertaking
	marketing activities to offer you products
	or services that may be of interest.

# Information we automatically collect from your use of the Site or the App

- ✓ Purchase history and saved items (such as what you bought and what you've placed in your cart or saved items)
- ✓ **Log data and device information** (such as details about how you've used the Site or the App, IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, location data and page/product views or clicks)
- ✓ Geo-location information (such as IP address, browser information or mobile GPS information)
- ✓ Cookies and similar technologies (such as web beacons, pixels, and mobile identifiers)

How we use information	Why we collect it
we automatically collect	
To provide customer	We use your saved products to help you
service and process returns	make a purchase, and we use your
	purchase history to uphold our contract
	with you and ensure that you've had a
	great customer experience.
To offer an improved user	We use your log data and device
experience	information to operate, protect, improve
	and optimize the Site and the App and to
	personalize and customize your
	experience. We have a legitimate interest
	in improving the Site and the App, as well
	as user experience.
To create and maintain a	We have a legitimate interest in protecting
secure environment	the Site and the App, to comply with
	applicable law and to measure the

	adequate performance of our contract with
	you.
Analytics, training and	We may use automatically collected
quality assurance	information to train our staff and perform
	internal analytics and performance
	monitoring. We have a legitimate interest
	in detecting and preventing fraud and
	improving our services and offerings.
Communication, marketing	We may use automatically collected
and advertising	information such as cookies and similar
	technologies to provide the most relevant
	advertising to you. This processing can be
	pursuant to your consent or pursuant to our
	legitimate interest in undertaking
	marketing activities to offer you products
	or services that may be of interest.

**Information we collect from third parties,** such as third-party services (such as if you link, connect, or login to the Site or the App with your Google, Facebook, Instagram or Twitter accounts) or other sources (such as your contacts or brands we partner with)

- ✓ Your name and contact details (such as your email address, mailing address, phone number and password)
- ✓ Social media handles (such as your Twitter or Instagram handle)
- ✓ Other information (such as demographic data, fraud detection information and information about you and your activities, experiences and interactions on and off the Site and the App)

How we use information from third parties	Why we collect it
Registration and profile	We will use information from third
	party services if you register with us

	using another service, such as
	Facebook. Connecting to third-
	party applications or services is
	optional. If you create your account
	by connecting through another
	service, we will collect public
	information from that connected
	account to help complete your
	profile.
Communication,	We may use information we collect
marketing and advertising	or receive from third parties to
	deliver and personalize our
	communications with you, or to
	administer referral programs,
	rewards, surveys, sweepstakes,
	contests or other promotional
	activities. This processing can be
	pursuant to your consent or
	pursuant to our legitimate interest
	in undertaking marketing activities
	to offer you products or services
	that may be of interest.
Non-member referrals	We may obtain your information
Non-member referrais	from a friend or other contact who
	wants to invite you to use the Site
	or App.
	We will use your information to
	facilitate your invitation and
	administer our referral program.
To create and maintain a secure	We may obtain your information
environment	from third party service providers
	and/or partners (e.g. identity

verification services) and combine it with information we have about you for fraud prevention and risk assessment efforts. We have a legitimate interest in detecting and preventing fraud and improving our services and offerings.

#### When We Share Your Information

We share your information with the following categories of recipients as an essential part of being able to provide the Site, the App and related services, including customer service, to you:

- ✓ Companies and individuals that help us deliver our products to you, such as suppliers, payment service providers, logistics professionals, and delivery and freight companies.
- ✓ Professional service providers who help us run our business, such as marketing companies, software vendors, consultants, and advertising partners.
- ✓ Companies approved by you, such as social media sites (if you choose to link your accounts to us) and payment processors (such as Worldpay) or financing providers (such as Barclays) if you choose to use their service.
- ✓ Government and law enforcement agencies, to (i) comply with a legal process, subpoena, order, or other legal or regulatory requirement; (ii) enforce our Terms of Use or other policies; or (iii) pursue available legal remedies or defend legal claims.

We share your information with third parties only as described in this Privacy Notice, with your consent, and as disclosed at the time we collect your information. We may anonymize your information and share such anonymized information with third parties for any purpose permitted by applicable laws.

#### **Cookies and Similar Technology**

We use cookies and similar technology (such as web beacons, pixels, tags or software development kits (SDKs) in our App) when you visit our Site and App to analyze the web traffic, to optimize the performance and content of the website and to promote trust and security. Cookies are small text files that are stored by your Internet browser on your computer. We generally use the following types of cookies for the following purposes:

**Necessary:** These cookies are necessary for you to interact with <u>Black</u> Steel Doors or the app's basic features. For example, they allow you to navigate the site and app, securely access important areas like your shopping cart, and more. Also, necessary cookies are used to maintain the website's and app's security features.

**Customer Preferences:** These cookies help us remember your actions so your site and app experience is tailored to your unique needs. This is how the site or app remembers items you viewed recently and makes certain interactions faster, like search. These cookies are also needed to preserve your preferences.

**Analytics:** These cookies send data to Black Steel Doors for the purpose of analysing customer behaviour so we can learn from your interactions to improve site and app experience for everyone. For instance, this data helps us better understand how users are finding information and which areas of the site or app are most helpful. This way we can evaluate Site and app performance and functionality to continuously develop, customise, and improve our services and offerings.

**Advertising:** These cookies are needed to enable Black Steel Doors online advertisements published on our partners' websites can be tailored to your personal interests (Behavioural Advertising). These types of cookies also limit the number of times that you see an ad and help us measure the effectiveness of our online marketing campaigns. We use cookies to help us identify and retarget users who have already taken an interest in our

products both on our Site and on third-party websites. For example, we use proprietary technology to specifically target users by creating advertising material that is based on the users' previous behavior and interests. Interest-based ads are displayed based on information about your activities, such as searching or purchasing a product on the website or app, visiting websites that contain our content or ads, or interacting with our tools. We do this using various digital marketing networks and ad exchanges, as well as specific services offered by some websites and social networks, such as Facebook.

A list of all cookies (and similar technologies) that we use on our website, including more detailed explanations, can be found on our cookie listing page.

We also use web beacons (or "web bugs" or "clear GIFs") to help us identify your computer and evaluate user behaviour, such as reactions to promotions. Web beacons are small GIF files that can be hidden in other graphics, emails, or similar. The information collected by web beacons cannot be used to identify you and are not associated with information on your computer or database.

#### **Cookie Settings**

Apart from the necessary cookies (and similar technologies), which are essential for accessing and using our website, we only use cookies (and similar technologies) with your consent, which you can grant, refuse or revoke at any time for each type of cookie (and similar technologies). You can manage and adjust your cookie settings at any time by clicking the "Cookie Settings" link in the footer of our website. Please note that your cookie settings may be reset if you delete your browser cookies, so you may need to re-enter them. You can also generally prevent the use of cookies by changing the settings in your web browser so that (i) it does not accept new cookies, (ii) it informs you about new cookies, or (iii) it deletes all already received cookies. By deleting or disabling future cookies, your

user experience may be affected, and you might not be able to take advantage of certain functions of our Site.

You can also opt-out of receiving some third-party interest-based ads, or learn more about behavioural advertising, by visiting www.youronlinechoices.eu. Please note that if you opt out of behavioural advertising, you will still see advertisements - they will just not be tailored to your interests.

To prevent web beacons on our site, you can use tools such as (AdBlock Plus or similar). To prevent web beacons in emails, please set your mail program so that no HTML is displayed in messages. Web beacons are also prevented if you read your email offline.

#### **Email Marketing**

If you provided your consent, we would send you marketing communications by email to keep you informed of new products, promotions, and other information we think may be of interest to you. In compliance with applicable law, we will also send you marketing communication per email, if you have purchased a product from us and have not unsubscribed from receiving marketing emails. We will also send you marketing communication per postal mail.

You can stop receiving marketing messages from us at any time through your preferences here or by contacting us at DataProtectionOfficer@ BlackSteelDoors. To stop direct marketing messages, you can also click on the "unsubscribe" link in any marketing email you receive from us. Once you do this, we will update your profile to ensure that you do not receive further marketing messages from us. Please note that it may take up to 48 hours to process your request and update our systems. Note that if you request that we stop sending you marketing messages, we will not stop sending you administrative and services communications (such as order updates and other important or transactional information).

Please note that if you use more than one name or email address when communicating with Black Steel Doors Ltd or using the Site of App, you may continue to receive communications from us to any name or email address not specified in your opt-out request.

#### Blogs, Reviews and Forums

The Site and App also may from time to time offer publicly-accessible blogs, reviews or forums. Any information you provide in these areas may be read, collected and used by others who access them. To request removal of your information from blogs, customer reviews or forums, please see Your Rights and Choices below. Please note that in some cases we may be unable to remove your information.

#### **Social Media Plugins**

The Site and the App use social plugins, which allow you to interact with us through your Facebook, Instagram, Twitter, and other social media accounts. If you visit a page of our Site or App that contains such a plugin, your browser establishes a direct connection to that social media's webservers. The content of the plugin is transmitted by the social media site directly to your browser and incorporated by the social media site into the Site or App. By integrating the plugins, the social media site receives the information that your browser has accessed the corresponding page of our Site or App, even if you do not have an account or are currently not logged in to your account. We have no control over the extent and use of information that the social media site collects using this plugin.

If you interact with a social media plugin by, for example, clicking a "Like" button or leaving a comment, the corresponding information is also transmitted directly to the social media server and stored there. Depending on your settings, the information will also be posted on the social media site and displayed to your contacts or friends on the social media site. The social media site may use this information for the purpose of advertising, market research and tailor-made pages.

To understand what information social media sites collect when you interact with their plug-ins, please review their privacy policies. You may also have the option to change your settings in the social media site to prevent the collection of your information.

#### **Our Security Measures**

We use appropriate technical and organizational safeguards to protect your information from unauthorized use, disclosure, and loss. Data transmitted to Black Steel Doors is encrypted using Transport Layer Security (TLS). We use a PCI compliant secure credit card processor and do not save your full credit card number on our information systems while placing an order. If you have questions about the security of your information, please contact us at order@blacksteeldoors.co.uk.

We encourage you to protect your password and your computer to prevent unauthorized access to your account. Remember to sign out of your account and close your browser window if you are using a shared computer in a public place such as a library or an Internet cafe.

#### **Keeping Your Information**

We will keep your information for as long as you have an account or as long as we need it to fulfill the purpose for which it was collected or disclosed to you at the time of collection. We may also keep some of your information as required to meet legal or regulatory requirements, resolve disputes, prevent fraud or abuse, enforce our Terms of Use, or for other legitimate business purposes (so long as keeping it for such purposes does not infringe upon your privacy rights).

When we no longer have a need to keep your information, we will either delete it from our systems or anonymize it so that it no longer identifies you.

#### **Your Rights and Choices**

You have the following rights related to the information that we maintain about you:

- ✓ The right to be informed about how your information is used. This is the reason we provide this Privacy Notice to you.
- ✓ The right to access the information we hold about you.
- ✓ The right to request the correction of inaccurate information we hold about you. You can correct some of this information in your account settings.
- ✓ In some circumstances, the right to request that we delete your information, or stop processing it or collecting it.
- ✓ The right to stop direct marketing messages, which you can do through your preferences here or by clicking on any "unsubscribe" link in any marketing email you receive from us. You also have the right to withdraw, with effect for the future, your consent for other processing activities for which you have given us your consent. Regarding your cookie settings, you can do this anytime using the "Cookie Settings" link in the footer of our website.
- ✓ The right to request that we transfer your information either to you
  or a third party.
- ✓ The right to, at any time, object to data processing based on legitimate interest or for direct marketing purposes

If you want to exercise your rights, please complete the Subject Access Request Form here. If you have any questions or concerns, please reach out to us using info@blacksteeldoors.co.uk

Moreover, you have the right to complain to your data protection regulator.

#### **Third Party Links**

We may provide links to third-party web sites that we do not own or control. We are not responsible for the information collection practices of these third-party websites and do not endorse such practices. We encourage you

to review and understand the privacy practices of third-party websites before providing any information to or through them.

#### **Children's Privacy**

The Site and the App are not directed to children under the age of 16, and we do not knowingly collect information from children under 16. If we learn that we have collected information from a child under 16, we will take steps to obtain the consent of that child's parent or guardian prior to processing that child's information any further. If do not obtain the parent or guardian's consent, we will delete the child's information from our systems.

#### **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time to reflect new ways that we process your information. If we make significant changes that affect your information, we will provide you notice of such changes through the Site, the App, by email, or some other means of contact. This notice will give you an opportunity to review the changes before we use your information in these different ways.

#### **How to Contact Us / Data Protection Officer**

We always want to hear from our customers - especially with your questions, comments or concerns about our privacy practices. Please don't hesitate to contact our Data Protection Officer by sending us an email at or DataProtectionOfficer@BlackSteelDoors writing us at:

Black Steel Doors Ltd, 1 Courtenay Road, East Lane Business Park, Wembley, HA9 7ND.