

Introduction

Arthur Butler Limited t/a Peppard Building Supplies ("We") are committed to protecting and respecting your privacy.

This policy (and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Arthur Butler Limited t/a Peppard Building Supplies is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Bishopsland Farm, Dunsden, Reading, RG4 9NR. For all data matters contact our Data Protection Manager on 0118 9721128 or dpm@peppardgroup.co.uk.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To register you as a new customer;
- To open a credit account or cash account for you;
- To process and delivery your orders for goods and services, including; dealing with enquiries, managing payments, fees and charges and collecting and recovering monies owed to us by you;
- To manage our relationship with you which will include; notifying you about changes to our terms of business or privacy policy or any other policy which affects you;
- To make suggestions and recommendations to you about goods or services that may be of interest to you;
- To comply with all applicable laws, regulations and rules.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Name, salutation, personal address, contact telephone numbers, personal email addresses, bank account details, credit history, payment card details, CCTV images, accident or incident information

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

x Consent of the data subject;	N/A
√ Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	For the enquiring, ordering, collecting and receiving delivery of and paying for goods and services
√ Processing necessary for compliance with a legal obligation	For accident and incident reporting
x Processing necessary to protect the vital interests of a data subject or another person	N/A
x Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	N/A
√ Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	For the opening of credit and cash accounts; For the recovery of money in case of non-payment; For providing details of goods and services we do;

b) Special categories of personal data (article 9 of GDPR)

N/A

More information on lawful processing can be found on the ICO website.

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with;

- Our credit reference agency
- Our employees for the performance of a contract
- Our suppliers and/or their agents (only as and when communication between the two parties is necessary for the performance of a contract).
- Statutory bodies such as local Environmental Health or the HSE as part of our legal obligation

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data.

Personal data	Period held
Credit and cash account application information including bank details	Three months after your account is closed

Credit agency's credit reference report	Three months after your account is closed
Personal contact information	Three months after your account is closed
Customer relationship management information including; <ul style="list-style-type: none"> Personal details Other contact details Call history notes Documents (excluding contractual documents) Credit information 	Three months after your account is closed
Customer relationship management information including; <ul style="list-style-type: none"> Contractual documents 	The duration of the contractual period
Sales invoices including; <ul style="list-style-type: none"> Invoice addresses Delivery addresses Delivery instructions Site contact details such as names, telephone numbers, email addresses 	Six years after you have closed your account
Accident or incident reporting	Three years and one month after the date of the accident or incident
CCTV	See below

CCTV

Purpose	Suggested retention period
Preventing and detecting crimes	One month, unless a crime is reported
Identifying training needs	Three months
Monitoring and ensuring security of our property	One month, unless an incident is reported
Ensuring policies and procedures are being followed	Three months
Investigating disciplinary or grievance issues	Three months
Monitoring production and work status	Three months
Monitoring driver and staff locations	Three months, unless needed for a specific incident
Monitoring your driving on our business	Three months, unless needed for a specific incident
Monitoring adherence to health and safety provisions and policies	Three months, unless needed for a specific incident

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract, for us to comply with our legal obligations and for the purpose of our legitimate interest except where such interests are overridden by the interests or fundamental rights or freedoms of you as the data subject.

If we are not able to process your personal data as above, we will not be able to supply you with goods or services.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

11. Automated Decision Making

Our credit reference agency will send us the results of credit reference checks after any application for a credit account has been made and this process may involve automated decision making or profiling. However, we always ensure that all decisions made by us as to whether credit facilities are offered or not are carefully reviewed and considered by a senior Director of Arthur Butler Limited t/a Peppard Building Supplies. This ensures that data subjects rights under GDPR are maintained and we are fair, open and transparent in our decision making.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Manager on 0118 9721128 or email dpm@peppardgroup.co.uk or post to Arthur Butler Limited t/a Peppard Building Supplies, Bishopsland Farm, Dunsden, Reading, RG4 9NR

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.