

Privacy Policy

At Centregreat, we are committed to respecting and protecting your privacy.

This Privacy Policy explains why and when we collect personal data about you when you are visiting our website (regardless of where you access it from), how we keep your personal data secure, how we use it and the conditions under which we may disclose it to others. This policy supplements all other privacy statements we may provide and is not intended to override them.

We may change this Privacy Policy occasionally so please check this page from time to time to ensure that you are happy with any changes. By using our website, you are agreeing to be bound by this Privacy Policy. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

Data Controller

Centregreat Limited is the data controller and has overall responsibility for this website. Any personal data you provide will be processed by Centregreat Limited and may be provided to any other Centregreat Company including Centregreat Rail Limited and Centregreat Engineering Limited (*collectively referred to as "Centregreat" or "we", "us" or "our"*) depending on what product or service you are enquiring about. We will confirm the controller for your personal data when you purchase any product or service with us.

We have made one of our company directors responsible for Data Protection and who will act as a data privacy manager. This director holds responsibility for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise any of your legal rights, please contact the data privacy manager using the details set out below.

Email address: simon.lambert@centregreat.net

Postal address: Simon Lambert, Legal and HR Director, Centregreat, Units 11-12 Wyndham Close, Brackla, Bridgend, CF32 1AD

Telephone number: 01656 650481

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 at 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.

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.

What personal data do we collect about you?

Personal data, or personal information or personal data 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). When you use our website, we obtain information about you. We may collect, use, store, use and transfer different kinds of personal data about you.

We have grouped the different kinds together as follows:

Identity Data: includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data: includes billing address, delivery address, email address and telephone numbers.

Financial Data: includes bank account and payment card details.

Marketing and Communications

Data: includes your preferences in receiving marketing from us and third parties acting on our behalf.

Transaction Data: includes details about payments to and from you and other details of products and services you have purchased from us.

Usage Data: includes information about how you use our website, products and services.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect special categories of your personal data including details about your; political opinions, ethnicity or race, philosophical or religious beliefs, sexual orientation, sex life, trade union membership, health information, biometric, genetic data, criminal convictions or offences.

What if you refuse or fail to provide your personal data?

By law or under the terms of a contract we have with you, we may need to collect your personal data. We may not be able to perform the contract we have with you or enter into a contract with you if you refuse or fail to provide the personal data we require. This means we may have to cancel the service you have requested from us. If this happens, we would notify you.

How do we collect your personal data?

When using our website, most of the data we collect about you comes from you directly. You may be asked to provide us with your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

As you interact with our website, we will automatically collect information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

How do we use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into, with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Keeping you up to date on our services. We may use your Contact, Usage, and Identity to decide if we think you may need, be interested in or want in our services.

Opting Out

Generally, we do not rely on consent as a legal basis for processing your personal data although we will obtain your consent for marketing communications if you have not made a request for our services, such as a quote or provided us with your Identity Data.

You have the right to withdraw consent to marketing at any time by simply contacting us by emailing us at info@centregreat.co.uk or by writing to Centregreat Limited, Unit 11/12, Wyndham Close, Brackla Industrial Estate, Bridgend, CF31 2AD.

If you would like to receive marketing and advertising from us then you will need to complete the relevant section of the website and provide us with your consent to do so.

Cookies

Your browser can be set to refuse some or all browser cookies, as well as alerting you to when websites access or set cookies. If you refuse or disable cookies, please note that some parts of our website may not function properly and become inaccessible. For more information about the cookies, we use to access the cookie policy on our website when you first log in.

Purposes for which we will use your personal data

We have set out in a table format at the end of this Privacy Policy a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Change of purpose

We only use your personal data for the purpose which we collected it for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. You can get an explanation of how the new purpose is compatible with the original purpose by contacting us, by emailing us info@centregreat.co.uk or by writing to Centregreat Limited, Unit 11/12, Wyndham Close, Brackla Industrial Estate, Bridgend, CF31 2AD.

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

Who do we share your personal data with?

Occasionally we may have to share your personal data as set out below:

- External Third Parties as required by law such as 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.
- Professional advisers acting as processors or joint controllers including auditors, bankers, insurers, accountants, based in United Kingdom.
- Providers acting as data processors based in the United Kingdom who provide IT and Systems Administration Services to us.
- Other businesses which become a Centregreat Company such as where we acquire new businesses or merge with them. If a change happens to our business, then the new owners may use your personal data as set out in the privacy notice in the same way.

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

Do we transfer your data internationally?

No. We do not transfer your personal data outside of the European Economic Area (EEA).

How do we keep your personal data secure?

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

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

How long do we retain your personal data?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purpose a satisfying any accounting, legal or reporting requirements. We may retain your personal data for a longer period where we have entered into a contract with you and we will hold such personal data connected with a contract for a period of 7 years after the end of the contract and for 13 years where any contract is signed as a deed.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from an unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means when considering the applicable legal, regulatory, tax and other requirements.

What are my legal rights?

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

- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your 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, (this is known as Data Portability), where applicable i.e. where our processing is necessary for the performance of our contract with you, based on consent or where we process your data by automated means).
- 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 correct any personal data if it is found to be out of date or inaccurate.
- The right to request a copy of the personal data which we hold about you.
- The right, where there is a dispute in relation to the processing or accuracy of your personal data, to request a restriction is placed on further processing.
- The right to object to our processing of personal data, direct marketing or processing of statistics, historical research or scientific purposes; where processing is based on legitimate interests or in the performance of a task in the exercise/public interest of official authority.

If you wish to exercise any of the rights set out above, please contact us by emailing us at info@centregreat.co.uk or by writing to Centregreat Limited, Unit 11/12, Wyndham Close, Brackla Industrial Estate, Bridgend, CF31 2AD.

Do I need to pay a fee?

To access your personal data or to exercise any of your other rights you will not have to pay a fee. However, we may charge a reasonable admin fee if your request is repetitive, excessive or unfounded. In these circumstances, we may refuse to comply with your request.

Do you need information from me?

Yes. In order to confirm your identity and ensure your right to access your personal data or any of your other rights, we may need to request specific information from you. We would do this as a security measure in order to ensure that we do not disclose your personal data to any person who does not have the right to receive it. We may also contact you to request further information in order to speed up our response.

Is there a time limit to respond?

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

Will this notice change and do I need to tell you if my personal data needs updating?

This version was last updated on 26th June 2018. It is important that we hold your current and accurate personal data. Please keep us informed if your personal data changes during your relationship with us.

What if I have requests, queries or concerns?

Contact us first by emailing us at info@centregreat.co.uk or by writing to Centregreat Limited, Unit 11/12, Wyndham Close, Brackla Industrial Estate, Bridgend, CF31 2AD to exercise all queries, complaints or relevant rights in relation to any data protection matter or this policy between you and us.

If we do not resolve your complaint to your satisfaction you have the right to lodge a complaint with the Information Commissioner's 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, and UK.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website,	(a) Usage	Necessary for our legitimate interests (to define types of customers for our

products/services, marketing, customer relationships and experiences		products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)