



Privacy Policy

This Policy is operated by GT Window Products Limited

This privacy policy applies to personal information about:

- Customers who use our services or create an account with us
- Our suppliers
- Website Visitors

What is personal information?

Personal information is any information relating to an individual/company who can be identified directly or indirectly, often by name, account number, location, an online identifier or other factors specific to their identity.

Personal information may include “special category data” relating to racial or ethnic origin, political opinions, religious beliefs, membership of a trade union, physical or mental health and criminal records and allegations.

As a rule, we do not collect “special category data” about clients or suppliers. The exception is where we identify suspected criminal activity such as fraudulent claims or the use of stolen payment card details or money laundering. In this case we will record details of the suspected criminal activity and may take appropriate action, including refusing to act on the customers’ behalf. We may also report the incident to the police or other appropriate authorities.

See below for details of how we may use your personal information.

Website Visitors: The personal information we may collect about you and how we use it

You can visit and browse our website without providing your name or contact details.

Like many websites, our server logs capture details of your operating system, browser software, IP (Internet Protocol) address and Uniform Resource Locator (URL), including the date and time of your visit.

You may choose to provide your contact details (name, address, business, job title, email address, telephone number) if you do any of these things:

- Submit a query or request a quote or other information
- Ask to be contacted by us
- Request to create an account

Separate terms and conditions may apply when you open an account or if you decide to participate in a competition so please make sure that you read them at the relevant time.

Customers: The personal information we collect about you and how we use it

If you purchase products or services from us, we may use your personal information in the following ways:



- to respond to your enquiries;
- to keep you informed about our products and services;
- to process your order and to follow up on orders that are not completed;
- to arrange visits to your Business address (e.g. to carry out a survey or analyse your requirements);
- to manage your account, including carrying out identity checks where relevant;
- to manage your credit account (if applicable) including carrying out credit checks;
- to use your purchase history to manage rebates and supplier claim backs;
- for market research purposes;
- to publish trends and/or to improve usefulness and content of our website;
- to track activity on our site.
- to notify you about important changes or developments to our site or services;
- to manage deliveries, returns and refunds;
- for product liability purposes;
- to deal with enquiries and complaints;
- for claims management and insurance purposes;
- for record keeping purposes.

Suppliers: The personal information we collect about you and how we use it

If you supply products or services to us, we may use your personal information in the following ways:

- for order processing and management;
- to manage deliveries, installations, returns and refunds;
- for product liability purposes;
- to manage your account, including conducting credit and other background checks where applicable;
- to notify you about important changes or developments to our websites or services;
- for supply chain management;
- to deal with enquiries and complaints;
- for claims management and insurance purposes;
- for record keeping purposes.

If you are a supplier and you have any questions about how we use your personal information, please contact the Commercial Team or your usual business contact.

More details about how we use different types of personal information are set out here:

Personal information is any information relating to an individual who can be identified directly or indirectly, often by name, account number, location, an online identifier or other factors specific to their identity.



<i>Personal Information</i>	<i>Purpose of Use</i>
Contact details: Name, address, business, job title, email address, telephone number, location	<ul style="list-style-type: none">• Responding to enquiries• Account management• Managing marketing preferences• Personalising advertising• Market research, surveys and advertising• Website security and tracking website use• Linking with social media services
Order details: Contact details, products, services, date & time of order/visit/delivery, delivery details, delivery addresses, delivery photographs, survey or installation details including photographs, payment method, payment details, refunds, claims, surveys and feedback	<ul style="list-style-type: none">• Order processing and fulfilment• Deliveries, returns, refunds• Quality assurance• Account management• Rebates and claimbacks• Customer analysis and research• Market research, surveys and advertising• Product liability• Handling enquiries and complaints• Claims and insurance purposes• Fraud prevention and detection
Account details: Contact details, passport/driving licence or other identity documents, order details, business type, sector, payment history, account status, purchase history and trends	<ul style="list-style-type: none">• Account management• Following up incomplete transactions• Handling queries• Identity verification• Customer analysis and research• Market research, surveys and advertising• Payment and debt management• Rebates and claimbacks
Credit Account details: Contact details, credit reference checks, order details, payment history, account status, credit limit	<ul style="list-style-type: none">• Account management• Verification of identity and credit rating• Handling queries• Payment and debt management• Rebates and claimbacks

How your information is accessed within GT Window Products Ltd

Our company uses centralised finance, supplier and customer management systems. Your information may be accessed by us for administrative and analytical purposes. However, you will not receive marketing unless you have agreed to that.



Legal Basis for Processing

Some of the information we collect is provided by you voluntarily (and therefore with your permission), for example when you sign up to open an account and/or submit a query. If you purchase items from us, or if you supply products or services to us, most of the information we collect is necessary so that we can fulfil the contract between us.

The remainder of the information is collected for our legitimate business purposes, which include:

- To keep in touch with current, past and prospective customers
- To provide account management and related services
- To gain an understanding of how our customers interact with us so we can provide the most relevant products and services
- To monitor the use of our website and improve its facilities
- To identify suspected criminal activity and take appropriate action
- To manage our supply chain and the relationship with our suppliers (including the management of rebates and claim backs)
- To protect and defend our rights

We collect personal information from you so that we can fulfil our minimum requirements needed to operate your account.

Retention

We will retain your personal information for as long as needed for the legitimate business purposes described above.

If you make a one-off purchase, we normally keep records of the transaction for 7 years. If you are an account customer or a supplier, we normally keep records for 7 years after the closure of your account or the last purchase or sale you made. In all cases, this is for accounting, tax and product liability purposes.

Your information may be retained for longer than this if there are valid legal grounds for us to do so, for example if required by law or court order, or as needed to defend or pursue legal claims.

Working with Service Providers

Like most organisations, we engage service providers to run our website and IT systems, to help us administer accounts, to conduct credit checks and fraud screening, and to handle postal and email marketing campaigns. We also work with many suppliers who provide products and delivery services to us.

We will only provide these companies with the information they need to deliver the service we have engaged them for and they are prohibited from using that information for any other purpose.

Whenever we share personal information about our customers or visitors to our website with our service providers, we will put in place contracts which require the service provider to protect the information and keep it secure.



Other Disclosures

Your information may be shared within GT Window Products Ltd for account management (including credit accounts), analysis and reporting.

Your personal data may be disclosed to the following third parties for the purposes described above:

- tax, customs and excise authorities
- regulators, courts and the police
- fraud screening agencies
- central and local government
- insurance companies
- other professional advisors

We may also disclose your personal information if we believe that the disclosure is necessary to enforce or apply our terms and conditions or otherwise protect and defend our rights, property or the safety of our customers and other users of the website.

We may disclose and/or transfer your personal information in connection with a reorganisation of all or part of our business, if the majority of our shares are bought by another company or if we transfer all or some of our assets to another company.

Transferring information to other countries

Some of the companies who provide services to us may be located outside the United Kingdom. We will ensure that those service providers comply with any legal requirements that apply to the transfer of personal information outside the UK, including, where appropriate, requiring the service provider to sign the approved European Commission Standard Contractual Clauses for the transfer of personal data to third countries.

Security

We are committed to safeguarding the personal information you provide to us. We use appropriate measures to protect the information that you submit through our website forms and the information we collect and store about our customers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of information you submit electronically, and any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organisational measures to safeguard your personal data against loss, theft and unauthorised use, access or modification.



Changes to this policy

Any changes to this privacy policy will be posted on our website

Access and Correction

If you would like to correct or update any of your other personal information, or if you would like a copy of the personal information we hold, please contact the GT Window Products Ltd Data Protection Officer at the address below. We may need to ask for proof of your identity before we can respond to your request.

Other Rights

You may also have the following rights in relation to your personal information:

- in certain circumstances, the right to restrict or object to the processing of your personal information, or request that your personal information is deleted
- where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent
- in certain circumstances, the right to receive a copy of the personal information which you have provided to us, in a structured, commonly used and machine-readable format or to request that we transfer that information to another party (known as “data portability”)
- the right to complain to a Data Protection Authority (see further below)

If you have a query about this privacy policy or wish to exercise your rights, please contact the companies Data Protection Officer by writing to them at:

GT Window Products Ltd
Unit 4203 Oakfield Close,
Tewkesbury Business Park,
Tewkesbury,
Gloucestershire
GL20 8PF

Or emailing them at:

accounts@gtwindowproducts.co.uk (marking emails for the attention of the Data Protection Officer)
If you are not satisfied with our use of your personal information or our response to any request made by you in relation to your personal information, you have a right to make a complaint to the Information Commissioner:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545745 (national rate) Email: caserwork@ico.org.uk