

GDPR - Privacy policy

Removal of Data

Due to the GDPR (General Data Protection Regulation) you can contact us and ask that your personal data be removed from our systems. We may have your data because you filled out an enquiring or booking request form via our website or you directly contacted us via email.

You have the right to contact us (contact details below) and ask that we remove your data. We will act on your request within 7 working days.

Privacy Policy

Elite Blinds & Curtains view data protection as a high priority. The Elite Blinds & Curtains website allows you to navigate our pages without entering any personal data. However if a subject wants to use the services via our website i.e. submit an enquiry, booking request or quote request; the processing of personal data becomes necessary. If the processing of personal data is necessary and there is no statutory basis for this type of processing, we will obtain consent from the data subject.

Elite Blinds & Curtains will always process a subject's personal data (name, address, email address, telephone number) in line with the General Data Protection Regulation (GDPR). Through this privacy policy, we will explain the purpose of the personal data that we collect its use and the process. The data subjects are informed of their rights through this policy.

Elite Blinds & Curtains as a controller has implemented measures to ensure the complete protection of personal data through our website. However, due to our website being internet based, it is not 100% protected and may have security gaps, so every data subject can transfer their personal data via alternative means e.g. by telephone.

1. Definitions

This privacy policy is based on the adoption of the General Data Protection Regulation (GDPR) and will use the terminology explained below.

a) 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.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

Personal data that has been pseudonymised – eg key-coded – can fall within the scope of the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.

b) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c) Processing

Any operation of set of operations performed on personal data, whether or not by automated means, such as collection, recording, organisation, storage, structuring, adaptation or altering, retrieval, consultation, use, disclosure by transmission, dissemination or making available, alignment or combination, restriction, erasure or destruction

Processing is 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.

d) Restriction of processing

Is the storing of personal data with the aim of limiting their processing in the future.

e) Profiling

The processing of personal data to evaluate particular personal aspects relating to a natural person, in particular to analyse or predict aspects of a natural persons performance at work, economic situation, personal preferences, health, interests, behaviour, reliability, location of movements.

f) Pseudonymisation

The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided

that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Controller or controller responsible for the processing

Controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

h) Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i) Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

j) Third party

Third party is 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.

k) Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Name and Address of the controller

Elite Blinds & Curtains, Braniel Hall, 208 Hillhall Road, Lisburn, Northern Ireland, BT27 5JA.

Phone: 028 90 826900

Email: info@eliteblinds.co.uk

Website: www.eliteblinds.co.uk

3. Cookies

Cookies are text files that are stored in a computer via an internet browser. Many internet sites and servers use cookies. The Elite Blinds & Curtains website use cookies. A cookie is a unique identifier by which internet pages and servers can be assigned to a specified internet browser. The cookies allow visited sites and servers to differentiate the individual browser of the data subject. An internet browser can be recognised via a cookie ID. Cookies allow internet users to have a more user friendly service when navigating; www.eliteblinds.co.uk

Our website is designed by Yell. Find details of the use of cookies and their categories.

- **Analytics** – We use analytics cookies to help us understand how users engage with the Site. An example is counting the number of different people coming to use the Site or using a particular feature, rather than the total number of times the site or feature is used. We would find it difficult to analyse how well our Site was performing and improve it without these cookies.
- **User Cookies** – We use cookies to improve your experience by remembering your preferences so we know how you like to use our Site. Examples of this would be remembering you so that you are served with the same content or to remember you when you come back to our Site.
- **Social Sharing** – We use third party cookies to allow you to share content directly on the social networking/sharing sites like Facebook, Twitter or Google+. Examples would be if you wanted to “like” or “tweet” about us or our products or services. Please see our “Third Party Cookies” section below for more details.
- **Interest-Based Advertising** – You will have noticed that when you visit websites you will be shown adverts for products and services you may wish to buy. The money made by website owners for showing third party adverts on their websites often pays for the cost of running the website and therefore usually allows you to use the website without having to pay a registration or usage fee. To try and ensure that the adverts you see are relevant to you third party cookies may be used to collect information about the types of things that interest you, for example websites you visit and the geography that you are based in. Having these cookies does not increase the number of adverts you will be shown, but simply makes the adverts you see more relevant. Please see our “Third Party Cookies” section below for more details.

4. Collection of general data and information

The Elite Blinds & Curtains Website collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be; browser types & versions, the website from which the system navigates onto our website, the date and

time, an IP address and similar data and information which may be used in the event of a security attack.

The data and information collected does not conclude about the data subject. The information is used by Yell (the processor) to optimize website content, ensure the website is delivering information correctly and provide authorities with the information necessary in a cyber attack.

The Elite Blinds & Curtains website analyses data and information anonymously with the aim of increasing data protection and security. This anonymous data is stored on a separate server as log files.

5. Contact via the website

The Elite Blinds & Curtains website allows the data subject to submit quick electronic contact to us, as well as direct communication via email. The personal data transmitted by the data subject will be stored for the purpose of processing or contacting the data subject. The data is not transferred to any third parties.

6. Routine erasure and blocking of personal data

The data controller will process and store personal data of the data subject for the period necessary to achieve its purpose or as far as this is granted by the law legislator to which the controller is subject to. If the storage purpose is not applicable or the storage period in line with the law legislator expires, the personal data will be blocked or erased in accordance with legal requirements.

7. Rights of the data subject

a) Right of confirmation

Each data subject has the right to confirm whether personal data concerning him / her can be processed by the controller. If the data subject wants to avail of this right, he / she may contact the controller at any time.

b) Right of access

Each data subject has the right to obtain from the controller free information about the personal data stored at any time. Furthermore, the European directives and regulations grant the data subject access to the below information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been disclosed

- the period for which personal data will be stored or if not possible the criteria to determine the period
- the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

The data subject has the right to obtain information as to whether personal data has been transferred to a third country or organisation. If this is the case the data subject has the right to be informed of the safeguards relating to the transfer of data.

If the data subject wishes the right of access, they may contact the controller at any time.

c) Right to rectification

Each data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data. The data subject has the right to have incomplete personal data completed, including by means of a providing a supplementary statement.

Right to rectification at any time, allows the data subject to contact the controller.

d) Right to erasure (Right to be forgotten)

The data subject has the right to obtain from the controller the erasure of personal data concerning him / her without undue delay. The controller is obligated to erase personal data where one of the below applies without undue delay as long as the processing is not necessary.

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the above reasons applies, the data subject has the right to request the erasure of personal data stored by Elite Blinds & Curtains at any time. Any employee of the controller shall ensure the erasure of the request is complied to.

e) Right of restriction of processing

Where one of the below applies, the data subject has the right to obtain from the controller, restriction of processing:

- The data subject contests accuracy of personal data for a period enabling the controller to confirm accuracy of data
- The processing of the data is unlawful and the data subject requests the restriction of use instead of erasure
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the above reasons applies, the data subject has the right to request the restriction of processing of personal data stored by Elite Blinds & Curtains at any time. Any employee of the controller shall ensure the request is complied to.

f) Right to data portability

It is the right of the data subject that he / she can request details of the personal data concerning them held by the controller in a machine readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

The data subject has the right to request data portability of personal data stored by Elite Blinds & Curtains at any time. Any employee of the controller shall ensure the request is complied to.

g) Right to object

It is the right of the data subject (granted by the European legislator) to object (relating to his / her situation) at any time the processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

In the event of a right to object by a data subject, Elite Blinds & Curtains will not process personal data unless we can demonstrate legitimate grounds for processing which override the interests, rights & freedoms of the data subject /establishment.

Elite Blinds & Curtains do not process any personal data for direct marketing purposes. However, in the event that this policy changed, the data subject has the right to object at any time which would prevent personal data being processed for these purposes.

The data subject has the right to object their personal details being used for scientific, statistical or historical research purposes unless the processing is necessary for the performance of a task carried out for reasons of public interest.

The data subject has the right to object to any employee of the controller. The employee will ensure the request is complied to.

h) Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Elite Blinds & Curtains shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of Elite Blinds & Curtains.

i) Right to withdraw data protection consent

8. Data protection provisions about the application and use of Facebook & Twitter

On this website, the controller has integrated components of the enterprise Facebook and Twitter. Facebook and Twitter are social network sites.

The definition of a social network: place for meeting socially on the internet which allows users to communicate. The social network sites serve as a platform to exchange opinions, experiences and personal / business related information. Facebook and twitter allow the creation of private profiles, uploading of images and networking through friend requests and follows.

Facebook and twitter plug-ins have been integrated into the Elite Blinds & Curtains website. Social network platforms are made aware of what specific sub-site of any website which is visited by a data subject.

Information is collected via these social network platforms regarding every call-up to a website and details of the duration stayed on that site and which specific sub-site of the internet page which was visited. Social network platforms collect this data associated with that particular logged in data subject. For example: If the data subject clicks on a Facebook button which is integrated to the website, Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data. If such transmissions are not desirable for the data subject then he / she should log off their Facebook account.

For more details on Facebook privacy and Twitter privacy, please navigate to the following:

<https://facebook.com/about/privacy/>,

<https://twitter.com/en/privacy>

9. Data protection provisions about the application and use of Analytics

On this website, Yell has integrated the component of Analytics. Web analytics is the collection, gathering, and analysis of data about the behaviour of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

Yell uses the personal data from the analytics of the website for the following:

☐ **Analytics** – We use analytics cookies to help us understand how users engage with the site. An example is counting the number of different people coming to the site or

using a particular feature, rather than the total number of times the site or feature is used. Without this cookie, if you visited the site once each week for three weeks we would count you as three separate users. We would find it difficult to analyse how well the Site was performing and improve it without these cookies.

10. Data protection provisions about the application and use of Instagram

On this website, the Yell controller has integrated components of the service Instagram. Instagram is a service that may be qualified as an audiovisual platform, which allows users to share photos and videos, as well as disseminate such data in other social networks.

If the data subject is logged in at the same time on instagram, instagram can detect when a data subject calls up on the website. For their stay on the website, the information is collected and stored.

Further information of instagram privacy can be found:
<https://www.instagram.com/about/legal/privacy/>.

11. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose.

If processing of personal data is necessary to fulfil a contract with a data subject, for example the supply of goods or provide a service, the processing is based on Article 6(1) lit. b GDPR. In cases such as online enquiries concerning the products and services, the processing operations are the same. Our company is subject to a legal obligation of processing of personal data for tax obligations, the processing is based on Art. 6(1) lit. c GDPR.

In other cases the processing of personal data may be necessary to protect the interests of the data subject or another natural person for example: if a company visitor was injured, we may require name, age, health insurance or other vital information passed to a medical professional or hospital. Then the processing would be based on Art. 6(1) lit. d GDPR.

Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

12. The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to conduct business in favour of the well-being of employees and customers.

13. How long do we keep personal data

We retain your personal data for no longer than is necessary for the purposes(s) for which it was provided. What this means in practice will vary between different types of data. When determining the relevant retention periods, we take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law;
- potential or actual disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your personal data from our systems when it is no longer needed.

14. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

The provision of personal data is partly required by law or results from contractual provisions. Sometimes it is necessary that a data subject provides us with personal data which we subsequently process. When our company signs a contract with a data subject, the data subject is obliged to provide their personal data. If personal data were not provided the contract with the data subject could not be concluded.

On providing personal data, the data subject must contact an employee of the controller. The employee will confirm the requirement of personal data either required by law or the necessity of fulfilling a contract.

15. Existence of automated decision-making

Elite Blinds & Curtains does not use automatic decision making or profiling

As a responsible company, we do not use automatic decision-making or profiling.

16. How to contact us

If you would like to exercise your data protection rights or if you are unhappy with how we have handled your personal data, please feel free to contact us: Elite Blinds & Curtains, Braniel Hall, 208 Hillhall Road, Lisburn, BT27 5JA. Phone number: 028 90 826900 or info@eliteblinds.co.uk.

If you're not satisfied with our response to any enquiries or complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) by:

- writing to: Information Commissioner's Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF;
- calling: 0303 123 1113; or
- submitting a message through the ICO's website at: ico.org.uk