

# **Basingstoke Fireplace Centre Limited**

## **trading as Fireplaces Direct**

### **Privacy policy**

#### **1. Introduction**

- 1.1 Your privacy is important to us at Basingstoke Fireplace Centre Limited and we are committed to safeguarding the privacy of our website visitors and service users. We will only use your personal information for the provision of the products and services you have requested from us and where we are required to comply by law. The protection, confidentiality and integrity of your personal data are our prime concerns. This privacy notice explains what personal information we collect from you when you interact with our products and services, and how we use this information.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. We will ask you to consent to our use of cookies when you first visit our website. You can manage your cookie preferences through your browser settings.
- 1.4 In this policy, "we", "us" and "our" refers to *Basingstoke Fireplace Centre Limited*. For more information about us, see Section 13.

#### **2. Credit**

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

#### **3. How we use your personal data**

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data, for example where a manufacturer provides us with enquiry leads they have received and send to us;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
  - (e) We only use your data for the purposes for which it was collected and, where relevant, to meet legal obligations. We use your personal data for the following purposes:

- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website. The legal basis for this processing is for our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include name, address, email address and telephone numbers. The source of the service data is you. The service data may be processed providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.4 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of selling relevant goods and/or services to you. The legal basis for this processing is our legitimate interests, namely the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.5 We may process information relating to transactions, including purchases of goods and services that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this process is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- 3.6 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.7 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.8 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

- 4.1 We may disclose personal data such as name and address to our suppliers insofar as reasonably necessary for manufacturers to rectify operating and service problems.
- 4.2 Financial transactions relating to our services are handled by our payment services providers, (*Barclaycard*). We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- 4.3 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, for example registering and certifying each appliance you purchase with Gas Safe or HETAS (where required) or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **5. Retaining and deleting personal data**

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes is only retained for the time necessary to process it for the purpose provided and to provide support for potential future service queries and shall not be kept for longer than is necessary for those purposes.
- 5.3 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### **6. Amendments**

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

#### **7. Your rights**

- 7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant

laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the address given in 13.3. We will promptly correct any information found to be incorrect.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims. You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer

need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any

time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

- 7.13 You may exercise any of your rights in relation to your personal data [by written notice to us. You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to the address given in 13.3.

## **8. About cookies**

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **9. Cookies that we use**

- 9.1 We use cookies for the following purposes:
- (a) analysis - we use cookies to help us to analyse the use and performance of our website and services
  - (b) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally

## **10. Cookies our service providers**

- 10.1 Our service providers may use cookies and those cookies may be stored on your computer when you visit our website. Data from the website may be accessible to certain types of persons in charge, involved with the operation of the site or external parties such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies. Those involved in the operation and maintenance of this website may collect files that record interaction with this website (system logs).
- 10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:  
<https://www.google.com/policies/privacy/>.

## **11. Managing cookies**

- 11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.
- 11.2 Blocking all cookies may have a negative impact upon the usability of many websites.
- 11.3 If you block cookies, you may not be able to use all the features on our website.

## **12. Links to other websites**

- 12.1 Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **13. Our details**

- 13.1 This website is owned and operated by Basingstoke Fireplace Centre Limited trading as Fireplaces Direct.
- 13.2 We are registered in England and Wales under registration number 06781206, and our registered office is at LFM Chartered Certified Accountants, The Stables, 23b Lenten Street, Alton, Hampshire GU34 1HG.
- 13.3 Our principal place of business and correspondence address is Unit 13 Basingstoke Business Centre, Winchester Road, Basingstoke, Hampshire RG22 4AU.
- 13.4 You can contact us:
  - (a) by post, to the postal address given above;
  - (b) by telephone, on the contact number published on our website from time to time;
  - (c) by email, with the email address provided on our website