

## **Data Privacy & Security Policy (includes Cookie Policy) updated 03/10/2023**

Extraglaze Ltd is committed to protecting the personal information you give us whenever you interact with us or our web sites. This Policy is intended to give you confidence that this information is safe and secure with us. It explains the following:

- how and what personal information is collected;
- how we keep this safe;
- what we do with your personal information;
- who we share your personal information with; and
- your respective rights and choices.

Use of our web sites is subject to the terms of this Policy and our Terms & Conditions: these should be read together. If you don't agree to these, please stop using our web sites immediately.

When you register on our web sites we collect personal information about you. You will find most of this available to view in your My Account e.g. "My Extraglaze". You will also find some controls there especially in respect of deleting personal data. We may also collect information about the way in which you use our web sites.

For certain purposes we may share your personal information with our service providers (e.g. couriers, and to request a review from you of our products & services) and regulatory or governmental bodies. Details follow below.

To discuss or action your rights as set out in this Policy, please use the options on our Contact Us pages.

### **Who are we?**

Extraglaze Ltd: offering secondary glazing products and services.

We are not registered as a Data Controller on the Register kept by the Information Commissioner's Office.

### **How and what personal information do we collect?**

We may obtain personal information from you through the websites, mobile applications or other similar devices, phone and in-person conversations and answer machines and email, in the course of trading with you under the following brands:

Extraglaze [www.extraglaze.co.uk](http://www.extraglaze.co.uk) and Saverglaze

**Prior to January 2023:** Milksafes (now under new ownership: [milksafes.co.uk](http://milksafes.co.uk))

Typically in the course of registering for and/or using our services we ask you to provide your name, address, phone number, and email address. These are regarded as personal because they are directly associated with your unique identity. Other information collected may not be personal, for example: about the windows in your home or another property.

We may then store quotes and orders and details of payments made to us.

You may be asked to provide bank details so that we can make a refund. After making such a refund your details will remain as a Payee (in our bank account). Please advise us if you wish us to

delete your Payee details.

If you choose to make a card payment over the phone we will hold this information until the card payment is complete; Or we will enter it directly into a device for electronic submission (never written down). However, we may record a statement to the effect "paid using card ending 1234" for example. Your card details will nevertheless be recorded independently by our card payment service provider (currently Worldpay) as this is a standard part of their day to day business, and this will conveniently facilitate any refunds that become necessary.

It is your responsibility to check that any information that:

- you have provided is correct, complete, accurate and not misleading and that you disclose all relevant facts.
- you expect us to rely on is up to date.

We do not collect personal information which data protection legislation defines as sensitive personal information, such as medical history or criminal convictions.

We do not knowingly collect or store any personal information about children under the age of 16. If you are aged under 16 please get your parent or guardian's permission before you provide any personal information to us.

If you are providing us with another person's information you should first ask them to read this Policy and our Terms & Conditions. By giving us information about another person you are confirming that they have given you consent to share these.

In order to ensure the services we provide you continue to meet your needs we may ask you for feedback on your experience of using our services and our products. Any feedback (service or product reviews) you provide may be stored and subsequently published on our web site including feedback you have volunteered to a third party service we employ for this purpose (currently we use Feefo). Either party may include your name and geographical area and specified other information because one or other has sought your permission. In addition we may use this as part of our programme of continuous improvement.

#### **How do we keep this information safe?**

Bank and card details are entered into our choice of service providers' online banking system and online (i.e. virtual) Merchant Account. These systems are encrypted and otherwise deemed secure by Natwest, and Worldpay from FIS or Nochex or Paypal respectively. You enter your details directly into their secure systems and we do not keep copies. If you provide such details over the phone we enter these into these same, secure systems, not into our own systems.

Our web sites always operate securely using https (you will see this or a padlock or similar in your browser to confirm this). Despite best practice no online system or data transmission is guaranteed safe from criminal activity such as cyber attacks. Consequently we cannot guarantee or warrant the safekeeping of any information which you send to us. By using our web sites and services you accept the inherent risks of providing information online and you may not hold us responsible for any breach of security.

Any office computers and any web servers holding your information are continually kept up to date with appropriate security through subscription to the latest anti-virus and firewall software,

including cyber security measures. Data has additional password protections and backups.

When you register on our web sites you create a My Account, which you sign into using a username and password. Our web sites encrypt the password so it is not readable by anyone even members of our technical team. You may change the password where you try to sign in, or call us to discuss resetting this in a secure way. The safe use and secrecy of your username and password (i.e. who learns or uses it and for what) is entirely your responsibility.

Some of your information will be less safe when it is outside our control, for example the personal information on an address label is readable by anyone that sees or handles your parcel. If you foresee a problem please discuss this with us so we can minimise it.

If you ask us to deliver goods outside the European Economic Area (EEA) then the respective couriers between here and there will handle some of your personal information. These businesses may not provide the same level of protection for your personal information. If you foresee or perceive a problem in doing so you should not take this risk and please do not ask us to deliver goods outside the EEA.

### **How do we use your personal information?**

The ways in which we may use your personal information include:

- enabling you to access and use various online services;
- personalising and improving the services we offer and deliver;
- research (such as analysing our customers' activities and demographics); and
- communicating with you about your quotes, products and services, as described now:

...sending you information about products and services which we think may be of interest to you - If you agree, we will contact you (depending on your contact preferences) via email, post, telephone, SMS, or by other electronic means such as via social and digital media this may include new product launches, newsletters and opportunities to participate in market research

...sending you requests for feedback, a questionnaire, and perhaps a request asking if you would willingly welcome another person wishing to see an installation before making a purchase decision. If you have requested a quotation we may submit a revised quote after the original expires.

...sending you a confirmation (automated or manual) message, by email, SMS, etc, containing personal information - so that you have a record of it and can easily retrieve this in the future. This is a standard part of our services and by using the services you agree to receive these communications;

We may share your information with others...

...to process the supply of goods where that may involve a third party i.e. where the provision of goods is subcontracted and dispatched directly to you;

...to take payment for an order i.e. where your details must be passed to a third party as is required to process a payment i.e. a bank or card payment processor;

...to process the dispatch of an order i.e. with a courier;

...to track goods that have been dispatched to you, which may involve us sharing your data with the courier including the product(s) you have purchased. This courier may also send us the information they collect about the items they have handled; the courier may also send us their relevant tracing information including who received and signed for the goods and when and where i.e. typical tracking information;

...to facilitate requests for reviews of our product. Therefore we pass your name and email address along with some very basic order information to our chosen independent third party service (currently Feefo.com) so that they can ask you to submit a review, and consequently manage your reviews. This service will independently seek your agreement in respect of privacy & security (thereby you engage with them separately);

...to match our data about you with data from other sources e.g. for credit checking - we may validate and analyse your information and, in some cases, match it against information that has been collected by a third party to ensure that the information we hold about you is as accurate, consistent and well-organised as possible;

...ensuring that any marketing material that we send you is reasonably appropriate to your needs, this process also ensures that our services continue to be as personalised and focused as possible;

... as required of us by statutory and/or authorised bodies: such information may currently only be obtained via an application to the Courts and we will not provide any information to these organisations except when subject to a Court Order or with your consent.

### **How to read and edit, or delete your information**

We will store the personal information you provide and we may re-use it as you interact with our web sites and when making return visits. If you do not want us to store and use your personal information in this way, some options are available to you: you can delete, edit and update information by going into your 'My Account' and selecting the options there.

You may also close your My Account in which case your personal information will be removed, specifically your phone number, address and email address. But we will keep details of any transactions and pertinent communications until it is no longer required by law.

### **Our grounds for processing your personal information are as follows:**

Consent – Where necessary we will only collect and process your personal information if you have given your consent for us to do so, for example, we will only send you certain marketing emails if we have your consent.

Legitimate Interests – European privacy laws allow for “legitimate interests” as a justification for processing your personal information. Our legitimate interests for processing your personal information are:

...to enable you to access and use the services offered by Extraglaze: processing any transaction between us and tracking sales (i.e. in advance of a transaction). This is an essential

part of us being able to provide the services to you;

...to keep you informed about your use of the services for example sending you a confirmation email of your order(s); and

From 25<sup>th</sup> May 2018, you have a right to object to our use of your personal information for these legitimate interests. If you request it we will stop processing your personal information unless valid circumstances apply, in which case we will let you know why we are continuing to process your personal information.

### **Who do we share your information with?**

When you use any of our services, we may disclose your personal information to the following parties:

...our choice of courier or postal service;

...other businesses that we engage to help us provide certain material goods or services. This will be made clear to you if and when this arises and we will seek your permission beforehand.

...our choice of Merchant or Payment Service Provider including Worldpay from FIS, Nochex or Paypal i.e. in the course of processing your payment in the normal course of doing business.

If you foresee or perceive a problem in doing so you should discuss this with us before we do business together.

Where permitted by data protection and privacy law, we may also disclose information about you (including electronic identifiers such as IP addresses) and/or access your account:

...if required or permitted to do so by law;

...if required to do so by any court, the Financial Conduct Authority, the Competition and Markets Authority or any other applicable regulatory, compliance, Governmental or law enforcement agency;

...if necessary in connection with legal proceedings or potential legal proceedings; and/or

...in connection with the sale or potential sale of all or part of our business.

If we reasonably believe false or inaccurate information has been provided and fraud is suspected, details may be passed to fraud prevention agencies to prevent fraud and money laundering.

### **What advertisements do we show on our sites?**

None pertaining to a third party. In a contrived sense we advertise Feefo, which delivers our independent trusted Reviews.

### **Your personal data rights and how to contact us**

You have the right in law to request a copy of the personal information we hold about you.

From May 25<sup>th</sup> 2018 you will have the following additional rights:

...to correct inaccurate or incomplete information

...to delete or remove your personal information from our systems;

...to 'block' us from using your personal information or limit the way in which we can use it;

...to request that we move, copy or transfer your personal information;

...to object to our use of your personal information including where we use it for our legitimate interests.

To make enquiries, exercise any of your rights set out in this Policy and/or make a complaint please use the options on our Contact Us pages.

If after discussing any concerns with us you remain unsatisfied you may write to us formally to complain. Then if our answer still does not satisfy you, you may be able to refer your complaint to the Information Commissioner's Office.

This Policy shall be governed and construed in all respects in accordance with the laws of England and Wales.

### **How long do we keep your personal information?**

We believe keeping your personal data for a period of 1 year is appropriate as some customers choose to investigate a purchase long before actually making it (for example to insulate their home for next winter rather than the summer before). Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the period you have indicated in response to your Registration or as asked at Sign In, or when notified it may otherwise expire (etc) or until you request it is deleted. We may contact you to ensure you're still happy to receive communications from us until you tell us otherwise. Even if we delete your personal information it may persist on backup or archival media for legal, tax or regulatory purposes.

### **Changes to this Policy**

We reserve the right to amend or modify this Policy at any time and any changes will be published on our web sites without necessarily notifying you. The date of the most recent revision will appear on this page. If we make significant changes to this Policy, we may also notify you by other means such as sending an email. Where required by law we will obtain your consent to make these changes. If you do not agree with any changes please do not continue to use the web sites.

### **Cookie Policy**

Cookies are very common, small harmless text files sent to your computer when you visit certain web sites (if not most of them). Each web site sends its own cookies (they are unique for every web site and are not transferable). These allow web sites to check what you have added to your basket and they simplify your visitor experience.

Some cookie functions are so basic that they are exempt from controls imposed under legislation. This is the case with the cookies used by Extraglaze Ltd.  
But we still ask you to accept this Cookie Policy.

Most web browsers automatically have cookies enabled, so you do not need to do anything except continue as normal. If you choose to disable them then some of the main features on some web sites will not work.

Please note that cookies can't harm your computer.

Cookies also help web sites to identify and resolve errors, or to determine relevant related products to show you when you're browsing.

We're giving you this information as part of our initiative to comply with recent legislation, and to make sure we're honest and clear about your privacy when using our web site. To find out more about cookies, including how to see what cookies are on your computer and how to manage and delete them (through your web browser's settings), visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).