

# **Privacy Policy**

## **Futures Supplies and Support Services Ltd**

### **Introduction**

The Data Protection Act 2018 (DPA 2018) and the General Data Protection Regulation (GDPR) impose certain legal obligations in connection with the processing of certain personal data.

### **Privacy Policy**

Our full privacy policy is explained below, but the main points to note are:

- We will only ever ask for what we really need to know.
- We will collect and use the personal data that you share with us transparently, honestly and fairly.
- We will always respect your choices around the data that you share with us and the communication channels that you ask us to use.
- We will put appropriate security measures in place to protect the personal data that you share.
- We will never sell your data.

### **Who are we?**

Futures Supplies & Support Services Ltd established in 1995, is a distributor of washroom and janitorial supplies to the B2B market. Company registration no: 3027863.

This Privacy Policy sets out our data collection and processing practices and the options regarding how your personal information is used.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website and services you're agreeing to be bound by this Policy.

The provision of your personal data to us is voluntary. However, without providing us with your personal data, we would be unable to fulfil our business requirements

### **1. How we use your information:-**

We may use your information to:-

- Process orders that you have submitted.
- Carry out our obligations arising from any transactions or sales contracts you have entered into by you and us.
- Notify you of any changes to our organisation.
- Send you communications which you have requested and communications that may be of interest to you.
- Conduct research into the impact of our communications.
- Make submissions to third parties, where you have made an enquiry that requires us to do so, for the purpose of completing our contract with you.

### **2. What information do we collect?**

The type and amount of information we collect depends on why you are providing it.

We will usually ask you for your name, email address and information about your organisation, including the name of the organisation, telephone number and address.

However, we may request other information where it is appropriate and relevant, for example if we are processing an order that you have submitted.

This additional information might include:-

- (1) Details on how you found us, who you previously purchased from, your physical address and your bank details or debit/ details.
- (2) Information about your computer and about your visits to, and use of, our website including your IP address, geographical location, browser type, referral source, length of visit and number of page views.
- (3) Information about the services you use, services and products of interest to you and/or any marketing and/or communication preferences you give.
- (4) Any other information shared with us in relation to the different purposes set out in 'How We use your information

### **Do we process sensitive personal information?**

Applicable law recognises certain categories of personal information as sensitive and therefore requiring more protection, including health information, ethnicity and political opinions. In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so; and will only do so with your explicit consent.

### **3. Communications and marketing**

Where you have provided us with your physical address, we may contact you by post; and where you have provided appropriate consent, also by telephone and e-mail, with targeted communications to let you know about our news, offers and/or activities that we consider may be of particular interest; .

### **4. Third-party payments**

We may pass your information to our third-party service providers, agent's subcontractors and other associated organisations for the purposes of completing orders, contracts and various tasks as well as providing services to you on our behalf.

These third parties have access to your Personal Information only to perform these specific tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **5. Children's data**

We do not knowingly process data of any person under the age of 16. If we come to discover, or have reason to believe, that you are 15 and under and we are holding your personal information, we will delete that information within a reasonable period and withhold our services accordingly.

### **6. Other disclosures**

We will disclose your Personal Information where required to do so by law or in accordance with an order of a court of competent jurisdiction, or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

#### **International Transfer**

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. This is because we work with trusted suppliers.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

In the event that a dispute arises with regards to the international transfer of data, you agree that the courts of England and Wales shall have exclusive jurisdiction over the matter.

In the event that we sell or buy any business/assets, we may disclose your personal and our customer data to a prospective seller or buyer of such business or assets.

## **7. Security of and access to your personal data**

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure or of access to your personal information.

Where we have given you a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Your information is only accessible by appropriately our trained staff and trusted suppliers.

The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. As such we make no warranties as to the level of security afforded to your data, except that we will always act in accordance with the relevant UK and EU legislation.

Otherwise than as set out in this Privacy Policy, we will only ever share your data with your informed consent.

## **8. Your rights and how consent works**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive communications from us about our products and services, then you can select to unsubscribe at any time or select your choices by ticking the relevant boxes situated on the various forms on which we collect your data.

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

- (1) Right to be informed – you have the right to be told how your personal information will be used. This Policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.
- (2) Right of access – you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we have as from 25 May 2018, we will have 30 days to comply.
- (3) Right of erasure – as from 25 May 2018, you can ask us for your personal information to be deleted from our records. In many cases we would propose to suppress further communications with you, rather than delete it.
- (4) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.
- (5) Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
- (6) Right to data portability – to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information (i) under your consent, (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact or (iii) by automated means, you may ask us to provide it to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the personal information in question using the contact details in section 14 below.

Where we consider that the information with which you have provided us does not enable us to identify the personal information in question, we may ask you for (i) personal identification and/or (ii) further information.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you consult ICO guidance.

You are further entitled to make a complaint about us or the way we have processed your data to the Information Commissioner's Office ("ICO"). For further information on how to exercise this right, please see the guidance at <https://ico.org.uk/for-the-public/personal-information>. The contact details of the ICO can be found here: <https://ico.org.uk/global/contact-us>.

## 9. Lawful processing

We are required to have one or more lawful grounds to process your personal information. Only the following are relevant to our company:

(1) Consent

We will ask for your consent to use your information to send you electronic communications such as newsletters and marketing and fundraising emails, for targeted advertising, and if you ever share sensitive personal information with us.

(2) Contractual relationships

Most of our interactions with customers and website users are contractual. It will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or to volunteer with us, or if you purchase something via our online shop.

(3) Legal obligations

Sometimes we will be obliged to process your personal information due to legal obligations which are binding on us. We will only ever do so when strictly necessary.

(4) Legitimate interests

(4) Legitimate Interest.

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities as long as its use is fair, balanced and does not unduly impact individuals' rights.

We will rely on this ground to process your personal data when it is not practical or appropriate to ask for consent.

When we use your personal information, we will consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair in other ways.

## 10. Data retention

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you ask us to delete it we will remove it from our records at the relevant time.

In the event that you ask us to stop sending you direct marketing/other electronic communications, we will keep your name on our internal suppression list to ensure that you are not contacted again.

We review our retention periods for personal information on a regular basis (see item 11 of this Privacy Statement). We are legally required to hold some types of information to fulfil our statutory obligations. You can request to remove your personal information at any time by contacting the data controller.

## **11. Policy amendments**

We keep this Privacy Policy under regular review and reserve the right to update from time-to-time by posting an updated version on our website, not least because of changes in applicable law. We recommend that you check this Privacy Policy occasionally to ensure you remain happy with it. We may also notify you of changes to our privacy policy by email.

## **12. Third party websites**

We may link our website directly to other sites. This Privacy Policy does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

## **13. Updating information**

You can check the personal data we hold about you, and ask us to update it where necessary by contacting the Data controller.

## **14. Contact**

Futures Supplies & Support Services Ltd is a Data controller within the meaning of GDPR and we process personal data.

Please let us know if you have any queries or concerns whatsoever about the way in which your data is being processed by either emailing the Data Protection Manager Marc Kemp at [info@futures-supplies.co.uk](mailto:info@futures-supplies.co.uk)

Or

By writing to us at the following address:-

To the Data Protection Manager - Marc Kemp  
Futures Supplies & Support Services Limited  
Unit 1 Valley Point Industrial Estate  
Beddington Farm Road  
Croydon  
CR0 4WP

If an access request is manifestly unfounded or excessive we may charge a "reasonable fee" for the administrative costs of complying with your request.