



**Express Fire**  
**Equipment** Ltd

## Privacy Policy

Policy Date:	March 2018
Prepared by:	N. J. Jones/T. Taylor
Reviewed:	N/A
Date of next review:	January 2019

## INTRODUCTION:

Express Fire Equipment Ltd. understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, suppliers and any other persons about whom we hold personal data in connection with our business and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. **Information About Express Fire Equipment Ltd.:**

Express Fire Equipment Ltd. is the data controller and is responsible for your personal data.

Express Fire Equipment Ltd. is a Private Limited Company registered in England under company number 4183211.

Registered address: The Old Bank, 1A Wilton Street, Chadderton, Oldham OL9 7NZ.

VAT number: 732578910

Data Protection Officer: The Board of Directors.

- Email address: [info@expressfire.com](mailto:info@expressfire.com).
- Telephone number: 0161 688 5050.
- Postal Address: Express Fire Equipment Ltd., Units 3-4 Mersey Road Industrial Estate, Mersey Road North, Failsworth, Manchester, M35 9LU.

It is important that the data we hold about you is accurate and up to date. If your personal information changes at any time then please let us know by emailing [info@expressfire.com](mailto:info@expressfire.com)

### 2. **What Does This Policy Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. **What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. You can find further information in our General Data Protection Regulation Policy, a copy of which is available upon request by emailing [info@expressfire.com](mailto:info@expressfire.com)

The personal data that we use is set out in Part 5, below.

### 4. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Payment information;
- Information about your preferences and interests;
- Payment information.

Data will be collected in a variety of ways including, but not limited to, data that you provide to use directly e.g. by filling in forms or sending us written communications (including emails). We may also receive information and data from public sources e.g. Companies House and we may use credit checking facilities to verify information about you and/or your business.

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful and legitimate basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data or because it is in our legitimate business interests to use it.

Your personal data can be used for the following purposes:

- Registering you as a new customer and providing and managing your account

and supplying our products and services to you in order to perform a contract with you:

- Some of your personal details are required in order for you to set up an account for you and/or enter into a contract with you and for the purchase of goods and/or the provision of services. Details required may include your name, title, billing and delivery addresses, email address, phone number, purchase details and card details. Please note that debit and credit payments are processed by a third party payment processor (Worldpay) and are NOT retained by Express Fire Equipment Ltd. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground and legitimate interests for this processing is so that we can supply goods and/or deliver services to you.
- Personalising and tailoring our products and services for you including written and electronic communications to you:
  - Electronic communications:
    - Marketing communications:
      - In accordance with the Privacy and Electronic Communications Regulations we may send you marketing communications from Express Fire Equipment Ltd. if you made a purchase or asked for information about our goods or services or if you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. If you are a Limited Company we may, under these regulations, send you marketing emails without your consent. Our lawful ground and legitimate interests of processing your personal data to send you marketing communication is either your consent or our legitimate interest (for example, to grow our business). You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out at any time either by clicking the opt-out links on any marketing communication sent to you OR by emailing us at [info@expressfire.com](mailto:info@expressfire.com).
  - Communicating with you:
    - Communication data includes any communication that you send to us including, but not limited to, letters, emails, telephone calls, facsimile, via the contact form on our website, text, social media messaging or posting. This may also include responding to emails or calls from you and we may also communicate directly with you on the telephone, in writing and by email or via social media. We process this data for the purposes of communicating with you. In turn, we may use this information to communicate with you including in writing, by email, facsimile or by telephone:
      - Informing you of order updates;
      - Sending you invoices, credit notes, account statements or general account queries;
      - Pricing and product queries and updates;
      - Informing you of technical or product updates;

- Information about our business e.g. opening times etc;
- Any other relevant business related information.
- Supplying you with information by email or post or by sending information along with other documentation (e.g. brochures, invoices etc) that you have opted-in to. You may unsubscribe or opt-out at any time by emailing the Data Controller ([info@expressfire.com](mailto:info@expressfire.com)) and requesting to OPT-OUT of communications or by using the unsubscribe feature that is included on any marketing emails.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data may be retained for the purposes of satisfying any legal, accounting or reporting requirements. Broadly we will keep data for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Information collected in relation to your customer account will be retained for as long as your account is active.
- Information for marketing purposes (e.g. your email address etc.) will be retained and used until you opt-out: an opt-out unsubscribe link will be included in each marketing email and you can contact the Data Controller by email ([info@expressfire.com](mailto:info@expressfire.com)) and request your information to be unsubscribed at any time.
- All financial data which may include some personal data is retained for a period of 6 years in accordance with Inland Revenue guidelines. The accounts information that is included contains bank statements and paying in books and cheque book stubs, management account information, copies of sales orders and some invoices, VAT return information, copies of supplier remittances and bank reconciliations.

You can also find further information in our Data Retention Policy, a copy of which is available by email from [info@expressfire.com](mailto:info@expressfire.com).

## 8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

## 9. Do You Share My Personal Data?

We may sometimes contract with third parties to supply products and/or services to you on our behalf. These may include payment processing, delivery and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold including, but not limited to, your name, address, telephone number, payment details including card details and cheques etc.

- Card processing: in order to process credit/debit card payments;
- Auditors: whilst on site and the information will not be copied or removed from our premises;
- Couriers: in order to facilitate the delivery and/or collection of goods and services to you;
- Government bodies: that require us to report processing activities;
- Fraud prevention agencies;
- Bank/financial institutions: paying in of cheques and electronic transfers.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance

with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

**10. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required. You will be kept fully informed of our progress.

**11. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of The Data Controller:

Email address: [info@expressfire.com](mailto:info@expressfire.com).

Telephone number: 0161 688 5050.

Postal Address: Units 3-4 Mersey Road Industrial Estate, Mersey Road North, Failsworth, Manchester, M35 9LU.

**12. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. The policy will also be reviewed at least annually. A copy of the current policy version can be requested by emailing [info@expressfire.com](mailto:info@expressfire.com).