



GDPR Privacy Statement & Data Protection Policy

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1. Introduction

- 1.1 Welcome to Harlequin Office Furniture Limited's privacy policy.
- 1.2 We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.
- 1.3 This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

2. Important information and who we are

2.1 Purpose of this privacy policy

- 2.1.1 This privacy policy aims to give you information on how Harlequin collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter or purchase a product or service or take part in a competition.
- 2.1.2 This website is not intended for children and we do not knowingly collect data relating to children.
- 2.1.3 It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

2.2 Controller

- 2.2.1 Harlequin is the controller and responsible for your personal data (collectively referred to as “Harlequin”, “we”, “us” or “our” in this privacy policy).
- 2.2.2 We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy policy. If you have any

questions about this privacy policy, including any requests to exercise [*your legal rights*], please contact the data protection manager using the details set out below.

2.3 Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data protection manager who is a director of Harlequin Office Furniture Limited. in the following ways:

Registered Address: Queensway Business Park, Dunlop Way, Scunthorpe, North Lincolnshire. DN16 3RN

England registered Company number: 2665163

Phone Number: 01724 271494

Email: fiona@harlequinofficefurniture.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. **Changes to the privacy policy and your duty to inform us of changes**

3.1 We keep our privacy policy under regular review. This version was last updated on 29th May 2018.

3.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

4. **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

5. How We Collect and Process Data

5.1 What Information Do We Collect?

5.1.1 We collect information about companies and individuals during and after the sales process. Typically, an initial enquiry from a company will include information about their name, company name, job role and contact information. This information is stored on our internal systems in order to process the enquiry.

5.1.2 During the sales cycle and any future business dealings, additional information may be stored if it is appropriate to the nature of our business. For example, additional contacts within a business, information and bank details/payment details.

6. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

7. How is your personal data collected?

7.1 We use different methods to collect data from and about you including through:

7.1.1 **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise.

- (a) apply for our products or services;
- (b) create an account on our website;
- (c) subscribe to our service or publications;
- (d) request marketing to be sent to you;
- (e) enter a competition, promotion or survey; or

(f) give us feedback or contact us.

7.1.2 **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies[, server logs] and other similar technologies. [We may also receive Technical Data about you if you visit other websites employing our cookies.] Please see our cookie policy [LINK] for further details.

7.1.3 **Third parties or publicly available sources.** We will receive personal data about you from various third parties [and public sources] as set out below:

(a) Technical Data from the following parties:

(i) analytics providers such as Google based outside the EU;

(ii) advertising networks inside the EU; and

(iii) search information providers based inside the EU.

(b) Contact, Financial and Transaction Data from providers of technical, payment and delivery services inside the EU.

(c) Identity and Contact Data from data brokers or aggregators based inside the EU.

(d) Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

8. How will we use the Information about you?

8.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

8.1.1 Where we need to perform the contract we are about to enter into or have entered into with you.

- 8.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
 - 8.1.3 Where we need to comply with a legal obligation.
 - 8.1.4 Click here [LINK TO GLOSSARY, LAWFUL BASIS] to find out more about the types of lawful basis that we will rely on to process your personal data.
 - 8.1.5 Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.
- 8.2 Harlequin Office Furniture Limited will not share your information for marketing purposes with companies outside the business. In order to process any future sales, we may send your details to and also use information from Credit Reference Agencies or Fraud Prevention Agencies.

9. Sales & Marketing

9.1 Promotional offers from us

- 9.1.1 We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).
- 9.1.2 You will receive marketing communications from us if you have requested information from us or purchased goods from us and you have not opted out of receiving that marketing.

9.2 Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

9.3 Opting out

9.3.1 You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time by email or telephone.

9.3.2 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, warranty registration, product/service experience or other transactions.

10. **Data Security**

10.1 We take the security of any personal information that we hold incredibly seriously. As well as ensuring our internal systems and databases are protected through best-practice techniques, we also hold a Cyber Essentials Certification that verifies our approach and attitude to Cyber Security. This document can be supplied on request.

10.2 All of the data we hold is based on storage within the UK. If you have a question about a specific service and the location of your data, please contact us.

10.3 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. **Website**

11.1 We gather and use certain information about individuals in order to provide products and services and to enable certain functions on this website, also collect information to better understand how visitors use this website and to present timely, relevant information to them.

11.2 We may collect the following information:

11.2.1 name and job title;

11.2.2 contact information including email address;

11.2.3 demographic information, such as postcode, preferences and interests;

11.2.4 website usage data;

11.2.5 other information relevant to client enquiries.

11.3 How we use this website data

11.3.1 Collecting this data helps us understand what you are looking from the company, enabling us to deliver improved products and services. Specifically, we may use data:

- (a) for our own internal records;
- (b) to improve the products and services we provide;
- (c) to contact you in response to a specific enquiry;
- (d) to contact you via email, telephone or mail for market research reasons.

11.4 Cookies and how we use them

11.4.1 What is a cookie?

- (a) A cookie is a small file placed on your computer's hard drive. It enables our website to identify your computer as you view different pages on our website.
- (b) Cookies allow websites and applications to store your preferences in order to present content, options or functions that are specific to you. They also enable us to see information like how many people use the website and what pages they tend to visit.

11.4.2 We may use cookies to:

- (a) **analyse our web traffic using an analytics package** - aggregated usage data helps us improve the website structure, design, content and functions
- (b) **identify whether you are signed in to our website** - a cookie allows us to check whether you are signed in to the site
- (c) **test content on our website** - for example, 50% of our users might see one piece of content, the other 50% a different piece of content

- (d) **store information about your preferences** - the website can then present you with information you will find more relevant and interesting
- (e) **to recognise when you return to our website** - we may show your relevant content, or provide functionality you used previously.

11.4.3 Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

11.4.4 Controlling cookies

- (a) You can use your web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device, set your web browser to *refuse cookies*.
- (b) However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you. Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it. To learn more about cookies and how they are used, visit <http://www.allaboutcookies.org/>

12. Change of purpose

12.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

12.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

12.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

13. Disclosures of your personal data

13.1 We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

13.1.1 Internal Third Parties as set out in the [*Glossary*].

13.1.2 External Third Parties as set out in the [*Glossary*].

13.1.3 Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

13.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

14. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

15. Controlling information about you

15.1 When you fill in a form or provide your details on our website we will only use this information you have provided to us for dealing with your relevant enquiry.

15.2 We will never lease, distribute or sell your personal information to third parties unless the law requires us to.

15.3 Again, we absolutely respect an individual's desire to remove their consent from our marketing activities or their personal data from our records entirely. We would like to happily exercise your rights, then please contact us using the details in this policy.

15.4 Any personal information we hold about you is stored and processed under our data protection policy, in line with GDPR.

16. Data retention

16.1 How long will you use my personal data for?

16.1.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

16.1.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

17. Your legal rights

17.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

17.1.1 [Request access to your personal data].

17.1.2 [Request correction of your personal data].

17.1.3 [Request erasure of your personal data].

17.1.4 [Object to processing of your personal data].

17.1.5 [Request restriction of processing your personal data].

17.1.6 [Request transfer of your personal data].

17.1.7 [Right to withdraw consent].

17.2 If you wish to exercise any of the rights set out above, please contact us.

18. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

19. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

20. Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

21. Glossary

LAWFUL BASIS

Legitimate Interest	means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
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Performance of Contract	means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
Comply with a legal obligation	means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

22. Third Parties

- 22.1 Service providers acting as processors who provide IT and system administration services.
- 22.2 Professional advisers including lawyers, bankers, auditors and insurers based in the EU who provide consultancy, banking, legal, insurance and accounting services.
- 22.3 HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

23. Your Legal Rights

You have the right to:

- 23.1.1 Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 23.1.2 Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 23.1.3 Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed

your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- 23.1.4 Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 23.1.5 Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
- (a) If you want us to establish the data's accuracy.
 - (b) Where our use of the data is unlawful but you do not want us to erase it.
 - (c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - (d) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 23.1.6 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 23.1.7 Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any

processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

24. CCTV surveillance & telephone call monitoring

The use of closed circuit television (**CCTV**) systems throughout our business premises at all sites, as deemed necessary (other than those where use would contravene common decency) to be visible on a television monitoring system. Any information obtained from systems will be used with strict adherence to the GDPR. Information will be used for the prevention and detection of crime and to ensure compliance with our policies and procedures and our legal obligations. Also please be aware calls may be recorded for training and monitoring purposes only.

25. Links from our site

25.1 Our website may contain links to other websites.

25.2 Please note that we have no control of websites outside the Harlequin domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy.

25.3 Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.

26. Contact

26.1 Please use the contact details in this policy to contact us at any time with any queries that you may have.