



1st January 2021

Smith Brothers Stores Ltd
Unit V2 Winchester Avenue,
Blaby, Leicester,
LE8 4GZ
Tel: 0116 222 7330
Email: head.office@sbs.co.uk

PRIVACY NOTICE

BACKGROUND:

Smith Brothers Stores 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 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 Us

Smith Brothers Stores Limited

A member of Smith Brothers (Leicester) Limited Group of Companies, registered in England under company number 962846

Registered address: Unit V2 Winchester Avenue, Blaby, Leicester, LE8 4GZ

VAT number: GB 317 4596 84

Data Protection Officer: David Bryson

Email address: data.protection@sbs.co.uk

Telephone number: 0116 222 7330

Postal Address: Unit V2 Winchester Avenue, Blaby, Leicester, LE8 4GZ

2. What Does This Notice 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, in simpler terms, 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.

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



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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 Notice 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 us 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 use 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.
- h) Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including (automated decision-making) and/or (profiling).

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
- Address



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- Email address
- Telephone number
- Business name
- Job title
- Profession
- Payment information / bank details
- Information about your preferences and interests
- Notes made by and for credit control purposes
- Credit check details

In the rare occurrence any personal data obtained from third parties it is either obtained from publicly available information, or from request by the individual.

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful 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 may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and/or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and/or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to receive (you may unsubscribe or opt-out at any time by contacting us as stated in Part 11).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our products and/or services. 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.

We use the following automated systems for carrying out certain kinds of decision-making and/or profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact us to find out more using the details in Part 11.



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- The following automated decision-making method(s) may be used:
 - When customers have 'back orders', unless they specifically request otherwise, the business will fulfil the oldest to latest back orders automatically when stock is replenished.
 - Credit search companies and other referencing agencies are used for credit checks. Without this process, the account may not be set up.
 - Credit insurance and such businesses require names, address, phone numbers, email address, bank details etc for customers that are going on / are on payment plans.
- The following automated profiling may take place:
 - If a manufacturer was to do a product recall or changes in product legislation we would notify customers who have directly purchased the units, and customers who purchase those type of products. This is purely for safety and can sometimes be legally required.
 - On occasions a branch or location might have operational issues and if this happens we can contact customers located in certain areas or who rely on the service, of the temporary situation.
 - On such instances like above, the company may filter content to specific individuals within each business so it is relevant to the recipient. I.e. accounts, sales, senior management.
 - Accounting software is used to obtain sales / purchase ledger data over a period of time for analysis purposes.
 - Insurance companies are used to help facilitate customer credit which may require profiling to enable such action.
 - Insurance brokers require information for providing annual insurance quotes for the company. This will also include any historical claims for a period of time.

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 will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Financial information such as invoices are typically kept in a secure location for six years and are then professionally shredded by an external company.
- Job applications are stored for up to 12 months.
- Testimonials are submitted by the user and stored until request removal and deletion.



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- Company promotions use and store data for up to 12 months. After this time it is achieved (if required) for up to six years as per the financial information statement above.
- Mailchimp, Jotform and other such online services (from the website) may store information if individual has voluntarily submitted the data. This is then removed and deleted upon request which can be made at any time up it is already mentioned above, i.e. company promotion, job application, testimonial...etc...

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 share your personal data with other companies in our group for the benefit of decision making ensuring we can continue to offer our products and services. This includes our holding company and its subsidiaries.

We may sometimes contract with the following third parties to supply products and 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.

- Courier services and similar companies are a carrier service we occasionally use to fulfil deliveries and they require address, name and contact number information.
- Credit insurance and other such businesses require names, address, phone numbers, email address, bank details etc for customers that are going on / are on payment plans.
- Credit search companies and referencing agencies are used for credit checks. Without this process, the account may not be set up.
- Lawyers used for claims will be given names, address and details of the case.
- Insurance brokers require information for providing annual insurance quotes for the company. This will also include any historical claims for a period of time.
- Auditors who require customer / supplier details for sample testing.
- External IT companies who take datasets for backup purposes on occasions. Their GDPR policy states that no customers data will be held for more than



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three months. They will for this reason, have full access to our systems and data.

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.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

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.

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 28 days and, in any case, not more than 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 up to a maximum of three months from the date we receive your request. 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 Data Protection Officer):

Email address: data.protection@sbs.co.uk

Telephone number: 0116 222 7330

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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.

Any changes will be made available via our website (www.sbs.co.uk) or on request from details in Part 11.