

# The Passmore Group's Privacy Statement Regarding Prospect and Customer Information

Issue Date: 1<sup>st</sup> May 2018

This Privacy Statement Regarding Customer Information (“Privacy Statement”) applies to the Passmore Group, the trading name of B&K Passmore Limited and covering the brands of More Bathrooms, More Ability and More Build. This Privacy Statement also does not apply to any other third parties.

This Privacy Statement governs Personal Information we collect from our prospects and customers.

For the purposes of this Privacy Statement, “Business Partner” means any subcontractor, vendor or other entity with whom we have an ongoing business relationship to provide products, services or information. “Personal Information” means information that may directly or indirectly identify you, such as your name, telephone number, email address and address.

## 1.0 INFORMATION WE COLLECT ABOUT YOU

We may ask you to provide Personal Information when you:

- Use our website
- Request quotes, services, information guides, brochures, newsletters or other information;
- Place orders for products or services or register for / at events, exhibitions and competitions;
- Create and manage an account;
- Participate in surveys or other promotional activities online or in any other venue;
- Provide a testimonial;
- Subscribe to newsletters, marketing and promotional emails or other materials;
- Interact with us on third party social networks (subject to that third party's terms of use and privacy policies); or
- Contact us

Categories of Personal Information we collect may include;

- Your name
- Email address
- Home address
- Contact telephone numbers – including mobile
- Site Address
- Job Title
- Company
- Support Workers, Carers or key family members

Health related information may also be requested if relevant to the service we are providing.

Forms that you choose to complete will indicate whether information requested is mandatory or voluntary. If you make a purchase, we may ask for your debit card number and billing information.

Passmore Group services may be presented under one of our three core brands More Ability, More Bathrooms and More Build. Your details are available across these brands as part of the central Passmore Group database.

You are able to request details about this data and its removal at any point of the process.

Data collected will not be shared with 3<sup>rd</sup> parties unless they are part of the service delivery or a trusted partner of Passmore Group.

## 2.0 HOW WE USE YOUR PERSONAL INFORMATION

Passmore may use your personal information to;

- Deliver the products, solutions, services and support or carry out the transactions you have requested;
- Send communications to you, including information about your order, installation job, warranties and referral programs. We may also send our monthly newsletter and additional information about our range of services. You may opt out of such communications at any point;
- Customise, analyse and improve our products, solutions, services (including the content and advertisements on our website to identify usage trends or determine the effectiveness of our marketing campaigns), technologies, communications and relationship with you;
- Better understand our customers, including profiling based on services take;
- Personalise content and implement your preferences;
- Enforce our conditions of sale, website terms and separate contracts (if applicable) with you;
- Prevent fraud and other prohibited or illegal activities;
- Protect the security or integrity of our websites, our businesses, and our products or services; or
- Perform other functions or serve other purposes, as disclosed to you at the point of collection, or as required or permitted by law.

### 2.1 Legal Basis of Processing

Our legal basis for collecting and using your Personal Information as described in this Privacy Statement will depend on the Personal Information concerned and the specific context in which we collect it. In general, we collect and process your Personal Information on one or more of the following bases:

- Your consent, for example where we have obtained your consent to process your personal data for certain activities such as sending guides and attending surveys. You are free to withdraw your consent at any time by contacting [mydata@passmoregroup.co.uk](mailto:mydata@passmoregroup.co.uk). If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it. Where applicable, we may ask for your consent to processing at the point where you provide your personal information.
- To comply with a contractual obligation (for example, using your address to send a fitter to site to install product purchased from us or using your personal details where you have asked us to do something before making a purchase, such as providing you with a quote). We will advise you upon collection whether the provision of your personal information is mandatory and of the possible consequences if you do not provide us with your information.
- For compliance where other laws require the processing of your personal information (for example, health and safety, taxation and anti-money laundering laws) or where we need your personal information to protect your vital interests or those of another person.
- Passmore Group's legitimate interests which include the provision of relevant products and services, and/or the carrying out of marketing and profiling activities, provided always that our legitimate interests are not outweighed by any prejudice or harm your rights and freedoms.

## 2.3 Retention of your data

We will retain your Personal Information as necessary in connection with the purposes described in this Privacy Statement, for as long as your account is active

## 3.0 HOW WE MAY SHARE YOUR PERSONAL DATA

We will only share your Personal Information with associates who agree to protect your Personal Information and use it solely for the purposes specified by Passmore. This includes our IT Support firm, accountants and software providers.

We may disclose your Personal Information for any purpose with your consent.

We may also disclose your Personal Information in connection with law enforcement, fraud prevention or other legal action; as required by law or regulation; if Passmore Group merges with another company; or if Passmore reasonably believes it is necessary to protect Passmore, its customers or the public.

We may share your information with trusted review sites and social media platforms with your consent

Except as described above, we will not disclose your Personal Information to third parties for their own marketing purposes without your consent.

## 4.0 HOW YOU CAN ACCESS YOUR PERSONAL DATA

At present if you wish to access the data we hold about you, please email us at [mydata@passmoregroup.co.uk](mailto:mydata@passmoregroup.co.uk)

## 5.0 YOUR DATA PROTECTION RIGHTS

Where the processing of your Personal Information is subject to UK Data protection laws, you have the following data subject rights. Please note that these rights are not absolute and in certain cases are subject to conditions as specified in applicable law:

- Right to be informed
- Right of access
- Right of rectification
- Right to erasure
- Right to restrict processing
- Right o data portability
- Right to object
- Rights related to automated decision making including profiling

In addition to the above, you have the right to lodge a complaint with a supervisory authority if you consider that our processing of your Personal Information infringes applicable data protection law. If you have any questions about the type of Personal Information we hold about you or if you wish to request deletion or correction of Personal Information we hold about you, or exercise any other data subject right, please send a written request to [mydata@passmoregroup.co.uk](mailto:mydata@passmoregroup.co.uk) or to the postal address provided at the bottom of this Privacy Statement.

## 4.0 OPTING OUT OF COMMUNICATIONS

You may choose to receive or not receive marketing communications from the Passmore Group by indicating your preferences. Opportunities to select your preferences include the following:

You can click “unsubscribe” in any marketing email communications we send you, or by sending us an email at [mydata@passmoregroup.co.uk](mailto:mydata@passmoregroup.co.uk)

## 5.0 HOW WE PROTECT YOUR DATA

The Passmore Group takes all reasonable steps to protect your Personal Information from misuse, interference and loss, as well as unauthorized access, modification or disclosure. The ways we do this include:

- Having in place technical and organizational measures designed to ensure the ongoing integrity, availability and resilience of processing systems and services;
- Limiting physical access to our premises;
- Limiting access to the information we collect about you;
- Limiting access to our central databases to only specified users and with varying access
- Ensuring that we and our Business Partners have appropriate security safeguards to keep Personal Information secure; and
- Where required by law, destroying or de-identifying Personal Information.

## 6.0 CONTACTING US

If you would like to contact us for any reason regarding our privacy practices, please email us at [mydata@passmoregroup.co.uk](mailto:mydata@passmoregroup.co.uk) or write to us at the following address:

DPO Office

Partnership House

6 Hales Road

Leeds

LS12 4PL

0113 2015030

