

**C.BROWN & SONS (STEEL) LIMITED**  
**PRIVACY STATEMENT**

C.Brown & Sons (Steel) Limited respects your personal data and is committed to protecting it.

Here you can find out about the types of information we collect from you, how we use it, how we might share data with others, how you can manage the information we hold and how you can contact us.

This statement describes processing relating to the information we obtain from you and other visitors and customers through a variety of different interactions, including when you visit our websites or social media pages, or contact our team.

We are a 'Data Controller' of your personal information which means we decide why and how it is processed. It also means we are responsible for that processing, which extends to any third parties we use who may process your information based on our instructions.

We may work with other organisations in connection with some of the processing activities described in this statement such as other companies within our group that include Cebron Motors Ltd and C Brown Services Ltd.

Where your data is collected and sent to other organisations for processing that is in both our and their interests, we will be making decisions together in relation to that particular processing and will be 'joint controllers' with the organisations involved. Under data protection laws, we will be jointly responsible to you for any processing of that personal data. Where this is not the case, the other organisation will be separately responsible to you and they will set out their responsibilities in their own privacy statement. We do not sell your personal data to anyone.

There may be occasions where we would like to offer promotions or market our products and services to you directly but you will be given the option to not receive such communications from us.

**What data do we collect?**

We collect information about you when you engage with our website, social media pages or when you contact us directly. We may also receive data from third party sources but we only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

Some of the information does not identify you personally but provides us with information about how you use our services and engage with us. We use this information to improve our services and make them more useful to you. An example of this is our use of Cookies on our websites.

For information about how we use Cookies, please visit the link to our Cookie Policy on our website. Here you can learn about managing the optional Cookies we use.

The information we collect may include some or all of the following:

1. Name (including title);
2. Address;
3. Phone number;
4. Date of Birth;
5. Email address;
6. The date and time you used our services;
7. The pages you visited on our website, the features you used and how long you visited us for;
8. Your IP address;
9. Your GPS location (where you have permitted access to this);
10. The internet browser and devices you are using;
11. Cookie, pixels or beacon information (for more information please see our [Cookie Policy](#));
12. The website address from which you accessed our website;
13. Details of any transactions between you and us;
14. Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses) and company details (some of which we may obtain from online or public business directories, including social media);
15. Voice recordings of calls and/or voice messages you may leave when making calls to our telephone support team;
16. Where you act on behalf of a business, any information we collect as part of business telemarketing activity;
17. Any information within correspondence you send to us;
18. Your social media name and identification number, any information you post on our social media pages, posts in which you include a hashtag or mention relating to us and information regarding your activities on our social media pages generally (for example, the time and date of your posts and your 'likes');
19. Your direct marketing preferences;
20. Details of services provided by our group companies that you have received or for which you have registered;

You have the option to not provide us with this information however, this may mean that you are unable to receive certain services from us or communicate with us effectively.

### **How do we use this data?**

We will only process information that is necessary for the purpose for which it has been collected.

There are various ways in which we may use or process your personal information:

#### **To Perform a Contract**

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us.

### Legitimate Interests

We may use and process your personal information where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

### Consent:

Where you have provided your consent, we may use and process your information in the following ways:

1. To contact you from time to time about promotions, events, products, services or information which we think may be of interest to you; and
2. To share your personal information with companies within our Group, so that they can contact you with marketing information about their products and services.

Where we collect your data from another source, we rely on our legitimate interests as the legal reason to process your data.

You have the option to withdraw your consent at any time by contacting us using the details below or by using the unsubscribe option provided in our marketing communications.

### Processing necessary to provide Customer Support, improve our services and respond to complaints, claims and regulators

- To respond to any correspondence that you send to us and fulfil customer requests.
- To respond to queries, complaints or claims and to manage legal and regulatory requests and requirements.
- To provide IT support and services.
- To analyse, evaluate and improve our products and services so that we can provide a more useful and enjoyable customer experience.

For example, we use Google Analytics software to collect information about how you use our website. This includes IP addresses. We do not store your personal information through Google Analytics as the data is anonymised before being used for analytics processing and we will not identify you through analytics information.

Google Analytics processes anonymised information about: the pages you visit on our website, how long you spend on each page, how you got to the site and what you click on while you're visiting the site.

- To enforce or protect our legal rights or to establish, bring or defend legal claims.

- To comply with a request from you in connection with the exercise of your rights (for example, the keeping of suppression lists where you have opted not to be contacted for the purposes of marketing).
- To inform you of updates to our terms and conditions and policies;

#### Processing necessary for us to promote our business, brands, products and services

We may contact you with marketing information after you have purchased a product or service from us. We will only do this in the way in which the law allows and we will only contact you with information about our own products and services and that we believe may be of interest to you. You have the right to object to us sending you this information at any time.

#### Legal Obligation

We may process your personal information to comply with our legal or regulatory requirements.

#### Vital Interest

Sometimes we will need to process your personal information to contact you if there is an urgent safety or data breach and we need to tell you about it.

#### **How do we keep your data safe?**

We use technical and organisational measures to safeguard your data and adhere to the UK General Data Protection Regulations with regards to protecting your data. This includes measures to deal with any suspected data breaches.

If you suspect any loss, misuse or unauthorised access to your data, please contact us immediately using the contact information below.

#### **Links to other websites**

This website may provide links to other websites. This privacy policy does not extend to linked websites. We do not have responsibility for the content of these websites or how they use and protect your data. We advise you to read the privacy policy of other websites prior to using them.

#### **How do we share your data?**

As previously stated, we do not sell your information to third parties. We do however work with our group companies and with third party suppliers who fulfil business activities for us.

**Transfers outside Europe.** There may be some instances where your information is processed or stored outside of the UK and EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf.

### **How long do we keep your data?**

We hold your personal information to give us an opportunity to form a relationship with you but we do not keep your personal information in an identifiable format for longer than is necessary.

There may be occasions where we retain your data after our relationship ends to establish, bring or defend legal claims.

Exceptions to this:

- Where the law requires us to hold your personal information for a longer period, or delete it sooner;
- Where you have raised a legal claim, complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or
- Where you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law.

### **How can you manage the information we hold about you?**

You have the right to:

- Ask for a copy of the information that we hold about you;
- Correct and update your information;
- Withdraw your consent (where we rely on it).
- Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
- Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
- Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

You also have the right not to be subject to purely automated decisions (including profiling) where this has a significant effect on you. We do not envisage that any decisions will be taken about you in this way, however we will update this statement if this changes.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of any substantial changes.

You can exercise the above rights and/or manage your information by contacting us using the details below:

**Post:** C.Brown & Sons (Steel) Ltd, Cochrane House, Pedmore Road, Dudley, DY2 0RL

**Email:** [sales@cbrownsteels.co.uk](mailto:sales@cbrownsteels.co.uk)

**Phone:** 01384 480048

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

**Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

**Call:** 0303 123 1113

**Email:** [casework@ico.org.uk](mailto:casework@ico.org.uk)