

GDPR DATA PRIVACY NOTICE

This is privacy notice of TC Fixings Ltd.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

We appreciate that there is a lot of information contained within this privacy notice, but we want you to be completely informed about your rights, and our responsibilities with regards to handling your data. This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

When you use www.tcfixings.co.uk, TC Fixings Ltd is the data controller.

1. WHO WE ARE AND IMPORTANT INFORMATION

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

3. HOW WE COLLECT YOUR PERSONAL DATA

4. HOW WE USE YOUR PERSONAL DATA

5. WHO WE SHARE YOUR PERSONAL DATA WITH

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

8. DATA RETENTION

9. YOUR LEGAL RIGHTS

10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

11. QUERIES, REQUESTS OR CONCERNS

1. WHO WE ARE AND IMPORTANT INFORMATION

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you place an order with us through the website, generate an enquiry for international order, send us an enquiry from the contact us section, send us a 'back in stock notification' for one of our products.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice 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 notice supplements the other notices and is not intended to override them.

Data controller(s)

TC Fixings Ltd, registered to Cambridge House, 16 High Street, Saffron Walden, Essex, CB10 1AX, company number 06445047, is the controller and responsible for your personal data (collectively referred to as "TCF", "we", "us" or "our" in this privacy notice). Our contact details are:

- Postal address: Unit 39, Shirehill Industrial Estate, Saffron Walden, Essex, CB11 3AQ
- Telephone: 01799 520640
- Fax: 01799 520744
- Email: sales@tcfixings.co.uk

For all data matters contact Mark Collins on mark@tcfixings.co.uk

TC Fixings Ltd is the controller and responsible for this website.

Third-party links outside of our control

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 notice of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows. The types of information we collect are:

- **Identity Data** – First name / last name / title / username and password (only if you register as a customer)
- **Contact Data** - Billing address / delivery address / email address / telephone numbers

We also collect, use and share aggregated data such as statistical or demographic data for the purpose of understanding client use of our website. Aggregated data may be derived from your personal data, but it is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature, or how what percentage of website users leave without making a purchase. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect your 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.

3. HOW WE COLLECT YOUR PERSONAL DATA

Directly - You may directly give us your identity, financial and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Buy our products and services, or make a request for quotation
- Create an account on our website
- Apply to open a credit account with us
- Send us an enquiry through the 'contact us' section of our website

4. HOW WE USE YOUR PERSONAL DATA

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:

- **Performance of Contract** this 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.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the 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 **[INSERT DETAILS]**.
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

We do not rely on consent as a legal basis for processing your personal data and we will never send you either direct or third-party marketing in any way.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our data representative (mark@tcfixings.co.uk, 01799 520640) if you need details about the specific legal ground we are

relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Create an online account / register as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
Process your request for a quotation to supply goods and services	(a) Identity (b) Contact	Performance of a contract with you
Process your request to notify you when a product is back in stock	(a) Contact	Performance of a contract with you
Process a credit account application	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to get feedback as to how we can improve our service to benefit our customers)
To use data analytics to improve our website, products/services, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business growth strategy)

Marketing

We have a strong view that marketing, and particularly SMS and email marketing is just annoying spam. We don't like receiving it ourselves, and because of that you will never receive any marketing from us.

We do not send any form of marketing to our customers with any of the contact data that we hold.

Promotional offers from us

We will not 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. You will not receive marketing communications or special offer communications from us.

Third-party marketing

We will not seek your consent to share your personal data with any third-party company for marketing, and **we will not** share your data with any third-party company or marketing purposes.

Opting out

Under the laws of GDPR you have the right to opt out of direct or third-party information messages at any time. You will not need to request this from us as we are not seeking your consent to process your data in this way - we do not hold your contact information for this purpose and will not send you any marketing information.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly, and you will not be able to checkout and pay for any orders via SagePay. For more information about the cookies we use, please see **[[LINK TO YOUR COOKIE POLICY.](#)]**

Change of purpose

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 our data representative (mark@tcfixings.co.uk, 01799 520640)

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.

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.

5. WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with trusted third parties set out below for the purposes set out in the table in paragraph 4 above.

Examples of the kind of third parties we work with

- IT and software companies who support our website and business IT systems
- Operational companies such as delivery couriers
- Payment processing providers to enable us to process your payment safely and do necessary fraud prevention checks
- Service review platforms to enable us to get feedback from customers about how they find our service and help us to improve for the benefit of our customers
- Analytical companies such as Google to help give us insight into how our customers are using our website. This is based on your acceptance of cookies on our website
- We may be required to share your information with the police or other enforcement, regulatory or government bodies within your country of origin, upon a valid request to do so. We assess these requests on a day to day basis and we will always take your privacy into consideration when responding to these requests.
- 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 notice.
- For further information, please contact our data representative – mark@tcfixings.co.uk, 01799 520640

So you are fully aware of who we work with and to give you full transparency, below is a list of the third party companies who will process your data as part of their contracts with us:

- Intact Software
- Sharp-Ax Computer Systems
- FedEx
- Royal Mail
- DPD Local
- World Options
- Trustpilot
- SagePay
- Worldpay

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.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we must keep basic information about our customers, including contact, identity, financial and transaction data for 6 years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact our data representative – mark@tcfixings.co.uk, 01799 520640.

No fee required – with some exceptions

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may 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.

10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 16/5/18. This privacy notice is new and designed to comply with GDPR. It replaced our old and now defunct privacy policy, but which can still be obtained by contacting us.

From 25th May 2018 there will be changes in data protection laws and we will then be able to respond to some of your requests, for example a request to see a copy of the personal data that we hold about you. We are still working towards getting our systems ready for some of these changes.

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

11. QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our data representative – Mr Mark Collins, mark@tcfixings.co.uk, 01799 520640.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.