



## Policy Number: 19 | Privacy Policy (article 30 of the GDPR)

### 1. Introduction

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. In this document, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

### 2. Who we are

Stan Robinson Group Ltd is the parent company for Stan Robinson Distribution Ltd and Stan Robinson Stafford Ltd. In this document all 3 areas of the company will be referred to as Stan Robinson.

Stan Robinson Stafford Ltd is the data controller for all the organisations within the group. This means that Stan Robinson Stafford Ltd determines what data is collected by each organisation within the group, how this data is going to be used and how this data is protected.

Our registered office address is:

#### **Stan Robinson Stafford Ltd**

**Ladfordfields**

**Seighford**

**Stafford**

**ST18 9QE**

**01785 282501**

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at [stacey.robinson@stanrobinson.com](mailto:stacey.robinson@stanrobinson.com)

### 3. Collection of personal data

We collect personal data from you for one or more of the following purposes:

1. To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest;
2. To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services;
3. To fulfil a contract that we have entered into with you or with the entity that you represent;
4. To ensure the security and safe operation of our websites and underlying business infrastructure, and
5. To manage any communication between you and us.

#### 4. Lawful basis for the processing of personal data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business systems infrastructure and compliance means that all personal data is processed on common, Group-wide platforms. We have processes in place to make sure that

only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

**The purpose test** – is there a legitimate interest behind the processing?

**Necessity test** – is the processing necessary for that purpose?

**Balancing test** – is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

#### 5. Storage of personal data

Stan Robinson is a UK based organisation whose primary offices are in the UK.

- The majority of our website and web applications systems are hosted in the EU and are accessed only by our UK-based staff.
- In all these instances, we have appropriate contractual and security measures in place to ensure that personal data is protected.
- Our customer relationship management, marketing and accounting systems for all our businesses are UK-based
- Unless we specifically state otherwise all of the CSPs that we use utilise EU-located processing facilities.
- Our payment processors and banking arrangements are based in the EU
- We ship and deliver physical products around the UK; therefore use logistics companies that are based within the UK. We have appropriate legal and security relationships with those partners.
- We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are retained for 1-7 years depending on the nature of the data.

#### 6. Security measures

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our processes.

We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

## 7. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email [stacey.robinson@stanrobinson.com](mailto:stacey.robinson@stanrobinson.com)

In order to process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

- **The right to be informed**

At Stan Robinson, we are obliged to provide clear and transparent information about our

- data processing activities. This is provided by this privacy policy and any related communications we may send you.

- **The right of access**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data
- If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

- **The right to rectification**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- **The right to erasure (the 'right to be forgotten')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested
- b) Processing of the personal data is unlawful
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research;
- Processing involves automated decision-making and profiling.

## **8. Complaints**

Should you wish to discuss a complaint, please feel free to contact us using the details provided. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union.

For the United Kingdom, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at: <https://ico.org.uk/global/contact-us/>.

Or call 0303 123 1113