



**dhh**timber

May  
2018

Privacy Policy

## SECTION ONE: Introduction

- 1.1) DHH Timber is committed to safeguarding the privacy of its customers, suppliers & website visitors.
- 1.2) This aforementioned policy applies where we are acting as a data controller with respect to the personal data of our customers, stakeholders, suppliers and website visitors; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3) We use cookies on our website to primarily help enhance your browsing experience, and to help us gain insight into how people interact and engage with its content. As these cookies are not strictly necessary for the provision of our website and our services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4) In this policy, "we", "us" and "our" refer to DHH Timber, its' employees and Data Controllers.

## SECTION TWO: How we use your Data

- 2.1) In this section we have set out the general categories of personal data that we may process; in the case of personal data that we did not obtain directly from you, the source and specific categories of that data; the purposes of which we may process personal data; and the legal basis for the processing.
- 2.2) We may process data about your use of our website and services. In this document we will refer to this as "**usage data**". The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services]. The legal basis for this processing is for our legitimate interests, namely monitoring and improving our website and services.
- 2.3) We may process information that you supply us with for publication on our website or through our services. In this document we will refer to this as "**publication data**". The publication data may be processed for the purposes of enabling such publication, and administering our website and services. The legal basis for this processing is consent via the author, or for our legitimate interests, namely the proper administration of our website and business; or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.4) We may process information contained in any enquiry you submit to us regarding goods and/or services. In this document we will refer to this as "**enquiry data**". The enquiry data may be processed for the purposes of offering, marketing and selling relevant

goods and/or services to you. The legal basis for this processing is consent.

- 2.5) We may process information relating to our customer relationships, including customer contact information. In this document we will refer to this as "**customer relationship data**". The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is consent; or our legitimate interests, namely the proper management of our customer relationships.
- 2.6) We may process information relating to transactions, including purchases of goods and services, that you enter into with us. In this document we will refer to this as "**transaction data**". The transaction data may include your contact details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- 2.7) We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters. In this document we will refer to this as "**notification data**". The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.8) We may process information contained in or relating to any communication that you send to us. In this document we will refer to this as "**correspondence data**". The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 2.9) We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether this is in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and

assertion of our legal rights, your legal rights and the legal rights of others.

- 2.10) We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely [the proper protection of our business against risks.
- 2.11) In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.12) Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **SECTION THREE: Providing Data to Others**

- 3.1) We may disclose your personal data to any member of our group of companies, our subsidiaries, our ultimate holding company and all its subsidiaries where it is deemed reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 3.2) We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3) Financial transactions relating to our services may be handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of [processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about our payment services providers upon request.
- 3.4) We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- 3.5) In addition to the specific disclosures of personal data set out in this section, we may disclose your personal

data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### **SECTION FOUR: International Transfer of Data**

- 4.1) In this section, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 4.2) We do not have offices and facilities outside of the United Kingdom, but do communicate with suppliers from outside the EEA. The European Commission has made an "adequacy decision" with respect to the data protection laws of such countries. Transfers will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the European Commission.
- 4.3) The hosting facilities for our website are situated in the United Kingdom, therefore international transfers for this medium of communication will not apply.
- 4.4) You acknowledge that personal data that you submit for publication for inclusion through our website or in case studies may be available, via the internet, around the world. We cannot prevent the use or misuse of such personal data by others.

### **SECTION FIVE: Data Retention & Deletion**

- 5.1) This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2) Any personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose, or those purposes.
- 5.3) We will retain your personal data for a minimum period of six months following the date you first provide it to us, and for a maximum period of seven years, moreso if the data includes transaction data that we need to retain for tax purposes.
- 5.4) In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention on a case-by-case basis.
- 5.5) Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to

protect your vital interests or the vital interests of another natural person.

## **SECTION SIX: Amendments**

- 6.1) We may update this policy from time to time by publishing a new version. This will be primarily found on our website, but can also be provided on request.
- 6.2) You should recheck this document occasionally to ensure you are happy with any changes to this policy.

## **SECTION SEVEN: Your Rights**

- 7.1) In this Section, we have summarised the rights that you have under all current and existing data protection laws. Some of the rights are complex, and not all of the details have been included in this summary. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2) Your principal rights under data protection law are the right to access; the right to rectification; the right to erasure; the right to restrict processing; the right to object to processing; the right to data portability; the right to complain to a supervisory authority; and the right to withdraw consent.
- 7.3) You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by contacting us using our details, and asking to speak to our Data Controller.
- 7.4) You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5) In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include the personal data are no longer necessary in relation to the purposes for which they were originally collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; the personal data have been unlawfully processed.
- 7.6) However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of

expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.

- 7.7) In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.8) You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.
- 7.9) You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.10) You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.11) To the extent that the legal basis for our processing of your personal data is (a) consent; or (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.12) If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence,

your place of work or the place of the alleged infringement.

7.13) To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.14) You may exercise any of your rights in relation to your personal data by written notice to us; in addition to the other methods specified in this section.

### **SECTION EIGHT: Definition of Cookies**

8.1) A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2) Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3) Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

### **SECTION NINE: Cookies on our Website**

9.1) We use third-party cookies (Google Analytics) to identify you when you visit our website and as you navigate our website; and to help us to analyse the use and performance of our website and services.

9.2) We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's own privacy policy is publically available to view at: <https://www.google.com/policies/privacy/>.

### **SECTION TEN: Our details**

10.1) Our website is owned and operated by DHH Timber Products Ltd.

10.2) We are registered in England and Wales under registration number 02377214, and our registered office is at 35 Ballards Lane, London, N3 1XW.

10.3) Our principal place of business is at DHH Timber Products Ltd, Milehams Industrial Estate, Tank Hill Road, Purfleet, Essex, RM19 1SX.

10.4) You can contact us:

- (a) by post, to the postal address given below;
- (b) using our website contact form;
- (c) by telephone on 01708 864245; or
- (d) by email, sales@dhhtimber.co.uk

### **Data protection officer**

Our data protection officer's contact details are:

**Nicola Hollington**  
Director

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