

The INDASOL Group

- incorporating PCD Sales Privacy Policy - Your Right To Be Informed

Privacy Statement:

PCD are committed to the processing of personal data transparently, responsibly, and in compliance with GDPR - the latest legislation surrounding data protection.

- We will use details collected during the order process to fulfil your order and for direct marketing in the future.
- Our lawful basis for processing is based on direct marketing being a legitimate interest.
- We will ensure that there is minimal risk of harm or distress from our direct marketing by taking steps to put data subjects in an equivalent position to consent, and by making unsubscribing/managing preferences simple and accessible. Marketing will be related to previous purchases with us or be relevant in a general B2B context, if applicable, to the best of our reasonable knowledge.
- We are committed to only using the minimum amount of personal data necessary. We have concluded that the data we collect is the minimum amount we require to fulfil orders and conduct direct marketing.
- We have implemented robust security protocols for the storage of all personal data and have various IT security accreditations.
- We will not sell personal data to any companies outside of **PCD**.
- We will conduct necessary due diligence with any third-parties involved in the processing of personal data and only use established, reputable and compliant partners to the best of our reasonable knowledge.
- We will ensure that a data subjects fundamental rights and freedoms are respected at all times.
- We may also use data for the purposes of ongoing fraud prevention.
- We may also contact you to inform you of any open baskets we are holding open for you.

1) PCD & Your Data

This privacy policy relates to that of PCD.

Thank you for choosing to purchase from **PCD**. We value the trust of our customers and strive to respect your privacy when handling data relating to the use of our websites and transactions performed on our websites.

This policy describes how we collect personal data about you, the type of data we collect, how this data is used and how you, a valued customer, can control the use of your data by **PCD**.

2) What Data Do We Collect?

In order to process orders and ensure the best possible levels of service, we collect certain personal and company information when you make a transaction. This includes:

- Your Title
- Your Name
- Your Company's Name (if relevant)
- Your Delivery Address
- Your Payment Address
- Your Payment Details (please note we do not retain this information as all transactions are done via a secure connection with an established payment provider)
- Your Email Address
- Your Telephone Number
- Browsing & Shopping Activities

3) How We Use Your Data

We will primarily use your data to:

1. Keep you updated on the status of your order
2. Fulfil delivery of your order
3. Contact you if there is a query regarding your order
4. Contact you in relation to product and / or website reviews
5. Verify your identity or perform security and credit checks in relation to larger orders or orders placed via Purchase Order
6. Assist with any customer queries

In addition, your data including Payment Address and Payment Details will be shared with relevant and reputable third-party banking providers in order to verify and authorise your payment so your order can be processed. All third-parties used to process payments are under strict obligation to ensure your personal information is kept private.

Cookies:

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

This website makes use of cookies to monitor visitor sessions. We may collect data about the type of device, internet browser and operating system that you use, and which pages you visit and interact with. We do this so we can ensure you have best user experience and can be presented with more relevant content, such as products you have previously viewed.

Information stored in the cookie that is issued by the site is not personally identifiable by us. The value stored in the cookie is an anonymous identifier, which is not linked to any other personal information you may give us during your visit. If you do not wish to receive these cookies you can easily and safely disable them in your browser, though doing so may affect the functionality of our website.

We share cookie data with advertising and analytical providers such as Google and Bing for the purposes of conducting online analysis and making improvements to our websites.

4) Direct Marketing

a) **Legitimate Interests**

We operate on an opt-out basis as we rely on 'legitimate interests' as a lawful basis for processing personal data.

We will process your personal data for the purposes of direct marketing of similar products and services from within **PCD** in the future, unless you take the opportunity to opt out of direct marketing upon completion of your first order with us, or unsubscribe at any point.

We do however acknowledge that we deal with some private individuals, and that individual employees of companies who input personal data whilst dealing with us have the right to be informed and the right to object to direct marketing. We have therefore put in place a number of controls to put our customers in an equivalent position of control to consent, and to minimise the potential for harm or distress that any unwanted direct marketing could cause. We have concluded these steps to be reasonable and effective in balancing our interest of direct marketing with customer's rights and expectations under GDPR.

More information on our legitimate interests assessment and justification for the above is available on request.

b) What You May Receive

The privacy of your personal data is of the highest importance to us. We will not share or sell your personal details to any company outside of **PCD** for the purposes of sending direct marketing.

Unless you have requested not to receive promotional material from **PCD**, have unsubscribed, or chosen to opt out at the point of purchase, we may use your personal information to provide you with other relevant offers and details of promotions relating to your transaction history. We may contact you in a number of ways using the personal data supplied when placing an order which includes:

1. Email
2. Post
3. Telephone

c) 'Ship To' Records

- We understand that many organisations may purchase from a central office and have their order delivered to a different address, such as an individual branch or office. We term a different address entered within the 'delivery address' section of an order as a 'ship to' record.
- We will use both billing and delivery address details for the purposes of direct marketing under legitimate interests as in these cases, we are unable to distinguish who has driven the purchasing decision; those who ordered the goods, or those who received them.
- If you choose to opt out of marketing at the point of ordering, you will be opting out the details obtained within the billing address. If you wish to also opt out any details used for the delivery of goods, you can contact us using any of the methods listed below.
- If you have received direct marketing from us because your details have been used for the delivery of an order, you can unsubscribe or manage your preferences as normal.
- We may contact 'ship to' records via email, post or telephone.

5) Data Retention & Security

When someone places an order with us, requests a quotation or catalogue, their details will be inputted to our CRM system and be stored on secure servers.

All customer personal data is stored on secure servers employing extensive security measures to ensure it remains fully protected at all times. All servers used for data storage are also physically secured and provided by reputable companies that meet the highest standards of security.

We do not store any payment card information on any of our own servers.

General Retention Periods

PCD will retain customer data for as long as is reasonable and necessary. For the purposes of direct marketing, suppression management and fraud prevention this may be a permanent basis.

However, we do acknowledge that private individuals purchase from us and under GDPR we have an obligation to ensure that data is kept up to date and accurate. We take this seriously and therefore have a number of controls in place to ensure that data can be amended easily, and that we take steps to ensure out of date data is not used for direct marketing.

More information on retention periods and the steps we have taken to keep data up to date is available on request.

During The Retention Period

PCD may use retained customer data for the purposes of ongoing direct marketing as well as enhancing the user experience and customer service. The data we collect and use:

- Title
- Name
- Company's Name (if relevant)
- Delivery Address
- Payment Address
- Email Address
- Telephone Number
- Browsing & Shopping Activities

We will store the details securely and back them up daily to secure servers.

We may use data for the purposes of preventing fraud in the future.

We may use data to enhance commercial analysis, customer profiling and improve targeting of future direct marketing.

Customers may unsubscribe from any marketing communication at any time. Their data will still be stored on the system and on secure servers. They will be flagged as not to be marketed to, but their data may still be used for fraud prevention, analysis and generic profiling purposes.

'Gone away' or out of date data will be kept on our system but will be suppressed from future marketing efforts.

We will not sell or rent data outside of **PCD** regardless of how long data has been retained for and will adhere to all other terms set out in our Privacy Policy.

Expiration Of The Retention Period

There is currently no expiration of the retention period – all data is held in perpetuity as has been deemed reasonable and necessary – further information is available on request.

Data Minimisation

PCD will not collect more personal data than the bare minimum for the purposes of order processing or direct marketing. Nor will we retain irrelevant information. We have concluded that the data we collect during the order process is the minimum amount we require in order to conduct direct marketing.

6) Managing Your Personal Data And How It Is Processed

As a valued customer and in line with GDPR, you have full control over your data and how it is used by **PCD**. We offer a number of ways our customers can manage their personal data in order to ensure that our interest of direct marketing does not override fundamental rights and freedoms or fall outside of a data subject's expectations.

Your right to object and your right to restrict processing:

Respecting your rights is important to us. We have no desire to send marketing material that is intrusive or not of interest.

To remove your data from email marketing:

Email sales@indasol.co.uk with “NO ESHOTS” as the email subject

To remove your data from Postal marketing:

Email us @ sales@indasol.co.uk with “NO MAIL” as the email subject

To remove your data from Telephone marketing:

Email us @ sales@indasol.co.uk with “NO PHONE” as the email subject

To remove your data from All marketing activity:

Email sales@indasol.co.uk with “REMOVE ALL” as the email subject.

**All of the above can also be managed in person by
calling our office on 0121 556 9900**

Updating Your Details – Your Right To Rectification

Should any of the information you have provided to us change, or require amending, please let us know the correct details by sending an email stating "Change Details" as the email subject, to sales@indasol.co.uk

Or

By sending a letter to the INDASOL GROUP, 10 Crystal Drive, Sandwell Business Park, Smethwick, B66 1QG

Or

By phoning us on 0121 556 9900 and stating the details you would like to rectify

Subject Access Requests – Your Right To Access

We respect an individual's right to access any personal data that we hold on them. As such we have an internal process in place in order to handle subject access requests expediently and in accordance with GDPR requirements.

PCD will:

- Provide a copy of the information free of charge. However, we will charge a reasonable fee based on administrative costs when a request is manifestly unfounded, excessive, or repetitive.
- Provide a response within one month of receipt.
- Take reasonable steps to verify the identity of the person making the request.
- Provide the information in a commonly used electronic format.
- Where possible, we will provide the information in a secure self-service system, such as a private link to the information hosted on a secure server.

Deletion Of Personal Data – Your Right To Erasure

We respect an individual's right to delete any personal data that we hold on them.

We recommend that a global suppression may be more benefit to a data subject as opposed to a deletion. This is where we still store a minimal amount of individual's personal data on our system, but mark it as not to be processed for any purpose. This is because it may be that we market to someone that has previously been deleted as part of a prospect list, which would obviously cause undue distress, however there would be no way for us to avoid it as we will have no record of the deleted details to suppress against.

Keeping the minimal amount of personal data we need in order to ensure that we do not contact an individual again may therefore be a preferable option. In this case we will explain to the data subject and offer a clear choice.

Third-Parties We May Share Your Data With To Fulfil An Order:

- **Payment gateways:** Your data including Payment Address and Payment Details will be shared with relevant and reputable third-party banking providers including PayPal and SagePay in order to verify and authorise your payment so your order can be processed. All third-parties used to process payments are under strict obligation to ensure your personal information is kept private.
- **Search Engines:** we use advertising and analytical packages from Google and Microsoft which use cookies in order to deliver their services effectively. This means that we share data collected via cookies on our websites with them, however this is not personal data for us, as we are unable to reasonably identify any individual from it.
- **Couriers;** we despatch orders via a number of established couriers, this involves passing name and address details used for delivery in order to fulfil the order.

7) Data Breaches

PCD have a breach reporting procedure in place and in the unlikely event of a breach, will act as per requirements under GDPR.

8) Changes To This Privacy Policy

We may update this privacy policy from time-to-time by posting an updated version on our websites. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our privacy policy by email.

Sale Of Business

If our business were sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchasers' advisers. They may also be passed on to the new owners of the business, in order to continue providing the service that is currently provided. The purchaser however will be required to follow the practices disclosed in this Privacy Policy or to give you at least three months' notice of any proposed changes.

**PCD SALES**
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PCD SALES is a trading style of The INDASOL GROUP.



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