

## Northcot Brick Ltd Privacy Policy

This is the Privacy Policy for Northcot Brick Ltd (“Northcot Brick”, “we”, “our”, “us”). This Policy explains how and why we collect and use personal data, and what we do to ensure it is kept private and secure.

### 1. WHO WE ARE

We are Northcot Brick Ltd, a company registered in England and Wales with company no. 494330 whose registered office is at Westhaven House, Arlestone Way, Solihull, West Midlands B90 4LH. For the purposes of the data protection law, we will be a controller of the personal data we hold about you. This means we make decisions about how and why your information is used, and have a legal duty to make sure that your rights are protected.

If you have any questions about our Privacy Policy, please contact us by emailing Judith Brazier at [judith.brazier@northcotbrick.co.uk](mailto:judith.brazier@northcotbrick.co.uk) or via telephone on 0121 713 7199

### 2. THE PERSONAL DATA WE COLLECT

We collect the following types of personal data:

#### Data you give us

Data that you provide to us when using [www.northcotbrick.co.uk](http://www.northcotbrick.co.uk) (our “Website”) including but not limited to your contact details about any requests for information you might make as well as details of your visits to our Website. This information may be provided at the time of requesting information about what we do or requesting a product. If you contact us, we may keep a record of that correspondence. If you send us personal data in connection with a job application, we may keep it for up to 6 months in case we decide to contact you at a later date.

#### Technical data

When you visit our Website, we may collect technical data about the device you are using, including where available your IP address, operating system and browser type. This is used for system administration and to improve the look and feel of our website.

#### Special Category Data (also known as sensitive personal data)

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.

### 3. COOKIES

A cookie is a small file of letters and numbers that we store on your browser or device if you agree.

We use the following type of cookies:

- a. Strictly necessary cookies – these are cookies that are required for operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website.
- b. Analytical/performance cookies – these cookies allow us to recognise and count the number of visitors and to see how visitors move around our Website. This helps us to improve the way it works, for example, by ensuring that users are finding what they are looking for easily.

- c. We also use cookies in our email communications to personalise the email and track whether the mail has been opened or read and whether the recipient has used any website link contained in an email message. This allows us to monitor and improve our email communications and website.
- d. Google Analytics – Our Website uses Google Analytics to show relevant adverts to users who have previously visited us as they browse the web. This enables us to tailor our marketing to better suit your needs and only display ads that are relevant to you. You may see Northcot Brick in search results pages (using Google AdWords), on YouTube, in banner adverts on Gmail and on other services run by Google. Any information collected will be used in accordance with this Privacy Policy and Google’s privacy policy. If you do not wish to see ads, you can:
  - opt out of Google’s use of cookies through Google’s Ads setting; or
  - Refuse the use of cookies by downloading and installing Google Analytics Opt-out Browser Add-on.
- e. Facebook Remarketing – we also use similar targeted advertising technology to ensure that we only serve people with adverts on their Facebook pages that are relevant to them. To enable us to do this, we include a piece of code on our Website, called the Facebook Pixel. The information collected, for example which pages you visited, which device you used and what actions you took, will be used in accordance with this Privacy Policy, as well as Facebook’s privacy policies. The Facebook Pixel only lasts for 60 days. Using the Facebook Pixel, we can also remarket adverts to you through Instagram, which is owned by Facebook. You can set preferences for how Facebook advertises to you using your Facebook ad preferences.
- f. Remarketing Cookies – you may notice that sometimes, after visiting a website, you see increased numbers of adverts from the site you visited. That’s because the website you visited has placed a cookie on your web browser. Using that cookie and web analytic tools, the website owner will be able to show you adverts on third-party websites that they think you might be interested in. This cookie does not give access to your computer or mobile device, but may be able to identify you from other details. Northcot sometimes does this. You can refuse to accept some or all cookies by modifying settings within your browser. For guidance on how to do this visit <http://www.aboutcookies.org>. However, if you block strictly necessary cookies, you may be unable to access certain parts 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:

- a. Where we need to perform a contract with you;
- b. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (see “Legitimate Interests” section below); and
- c. Where we need to comply with a legal or regulatory obligation.

We may use personal data held about you in the following ways:

- a. To fulfil orders you have placed (either on your own behalf, or on behalf of your organisation);
- b. To communicate with you about news, new products and other events that you may be interested in;
- c. To ensure that content from our Website is presented in the most effective manner for you and for your device;
- d. To enhance and improve the way we communicate with you;
- e. To process your job application, credit account application or other application you may make;
- f. To respond to requests for information and queries you send us; and

- g. To carry out obligations arising from any contracts entered into between you and us, or between us and our customers e.g. where you are an employee of a customer

When contacting you for the above purposes we may do so by phone, post, email or other electronic means, unless you instruct us not to do so.

Your data will be treated in accordance with applicable data protection law. It will not be disclosed to anyone outside of Northcot Brick, its affiliated or associated companies, and any other parties named or described in section 8 below.

#### **Legitimate interests**

We may rely on legitimate interests to process your personal data, provided that your interests do not override our own. Where we rely on legitimate interests, these interests are:

- a. To keep our records updated and to study how our Website and other services are used;
- b. To administer and protect our business and web presence (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting); and
- c. To grow our business and inform our marketing strategy.

### **5. MARKETING**

Where you are acting as an agent, employee or contractor of one of our business customers, we may send you information about our products and services by email or post. If you wish to opt out of receiving such material, please either contact using the details given in section 1 above, or click the “unsubscribe” link in any of our marketing emails.

### **6. KEEPING YOUR PERSONAL DATA SAFE**

We employ a variety of physical and technical measures to keep your personal data safe and to prevent unauthorised access to, use or disclosures of it. We control who has access to your data (using both physical and electronic means). Our staff receive data protection training we have a set of detailed data protection procedures which they are required to follow when handling personal data.

### **7. STORAGE AND RETENTION**

#### **Where we store your personal data**

Electronic data and databases are stored on secure servers in the United Kingdom and we do not transfer your personal data outside of the European Economic Area.

#### **How long we keep it**

We collect and store personal data for purposes connected with our business. As such, we will only retain your personal data for as long as necessary for those purposes.

We keep information which forms part of our business record for the life of the product in order to guard against the risk of a legal claim or a request by the tax authorities to review our business records. As the lifespan of our products can differ depending on a range of factors, this period will be determined on a product-by-product basis.

## **8. DISCLOSING YOUR PERSONAL DATA**

We may need to disclose your personal data to third parties. Where we do so, any such disclosure will be on the basis that these third parties are required to keep the data we give them confidential and secure, and will not use it for any other purpose than to carry out the services they are performing for us. We may disclose personal data to:

- a. Delivery companies in order to fulfil orders you or your employer has placed with us;
- b. 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 policy;
- c. Third parties with whom we are associated in order to perform certain functions, for example to our Website development partner in order to improve and enhance our Website;
- d. Our professional advisors; and
- e. Our ultimate holding company (EH Smiths Holdings Limited)

## **9. DISCLOSURES REQUIRED BY LAW**

We are subject to the law like everyone else. We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. We also may need to retain and disclose certain personal data about you to regulatory authorities and to appropriate agencies to conduct anti-money laundering checks and assist with fraud prevention. We will disclose this information as is required by law.

## **10. LINKS TO THIRD PARTY WEBSITES**

This Privacy Policy applies solely to the personal data collected by Northcot Brick and does not apply to third party websites. Northcot Brick is not responsible for privacy policies of other websites before providing them with any personal data.

## **11. YOUR RIGHTS**

We want you to remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- a. Where your personal data is processed on the basis of consent, the right to withdraw that consent;
- b. The right to confirmation as to whether or not we are holding any of your personal data and, if we are, to obtain a copy of it;
- c. The right to have certain data provided to you in a portable electronic format (where technically feasible);
- d. The right to have inaccurate personal data rectified;
- e. The right to object to your personal data being used for marketing or profiling, or on the basis of our or a third party's legitimate interests;
- f. The right to restrict how your personal data is used; and
- g. The right to be forgotten, which allows you to have your personal data erased in certain circumstances (though this is not an absolute right and may not apply if we need to continue using it for a lawful reason).

If you would like further information about any of your rights or wish to exercise them, please contact us using the details given in section 1.

Please keep in mind that there are exceptions to the rights of the above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so (for example, because the information no longer exists or there is an exception which applies to your request). If you are not happy with our response, or you believe that your data privacy rights have been infringed, you should contact the UK Information Commissioner's Office which oversees data protection compliance in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

## 12. UPDATING THIS POLICY

We may update this Policy at any time. When we do, we will post a notification on the main page of our Website and we will also revise the updated date at the bottom of this page. We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal data we hold.

This policy was last updated on 25<sup>th</sup> May 2018