

Privacy Policy

Classico Marble Ltd v1. 24.05.18

INTRODUCTION

Welcome to the Classico Marble Limited (Classico Marble) Privacy Policy.

Classico Marble respects your privacy and is committed to protecting your personal data. This Privacy Policy will tell you how we look after your personal data and inform you of your privacy rights and how the law protects you.

Please use the Glossary at the end of this Privacy Policy to understand the meaning of some of the terms used in it.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how Classico Marble collects and processes your personal data, including any data you may provide to us when you contact us via our website, purchase a product or service or contact us to enquire about doing so.

It is important that you read this Privacy Policy together with any other privacy notice on our website from time to time so that you are fully aware of how and why we are using your data.

CONTROLLER

Classico Marble is the controller and responsible for your personal data (collectively referred to as, “we”, “us” or “our” in this Privacy Policy).

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us via our [website contact us page](#) and state that your query is regarding your personal information.

CONTACT DETAILS

Our full details are:

Classico Marble Limited, registration number 03118551.

Postal address: Classico Marble Ltd, Stacey's Yard, Station Road, Langley, Slough, Berkshire, SL3 6DB.

You can also contact us through our [website contact us page](#).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk>). In the UK, please read: <https://ico.org.uk/for-the-public/raising-concerns/> for details of how to do this. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We may need to update this Policy at any time and without notice and where we do this we will notify you by including pop up boxes on the website and/or emailing our customers. This Policy was last updated on 24th May 2018.

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

THIRD-PARTY LINKS

Our 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 Policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- Identity Data includes first name and last name.
- Contact Data means the data we use to contact you including your billing address, delivery address, email address and telephone number.
- Financial Data means the data we use to process your payments for your orders including your payment card details.
- Transaction Data means details about transactions you have made including the payments to and from you along with other details of products and services you have purchased from us.
- Profile Data includes purchases or orders made by you.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share aggregated and/or anonymised data ("Aggregated Data") such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but 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 purchasing a specific product. 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 Policy.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect 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, where you do not provide suitable delivery instructions to provide you with our products 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 IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity Data, Contact Data, Transaction Data, Profile Data, Financial Data and Marketing and Communications Data by using our website, filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
 - purchase a product or service
 - request information to be sent to you;
 - give us some feedback

4. THIRD PARTY SOURCES OF DATA/DATA SHARING:

We also collect from and share data with the following providers:

- Professional Advisers and Investors: We may also share your data with professional advisers such as our lawyers and insurers to manage risks and legal claims. This is in our legitimate interests.
- Group: It is possible we could sell our business to a third party or re-organise our business or become insolvent. In that scenario, our database of customers is one of the biggest parts of that business and so we would need to share it with the third-party buyer and their advisers. This is in the legitimate interests of selling our business. We may also expand our group of companies and in this scenario we may share your data within our group in order to improve our products and services and because of some of our internal support services may be shared across the group. This is in our legitimate interests of cost efficiency and growing our business. Where this occurs, we will post a link to all group companies and their locations in this Privacy Policy and they will use it in the ways set out in this Policy.
- Law Enforcement/Legal Compliance: We will cooperate with all third parties to enforce their intellectual property or other rights. We will also cooperate with law enforcement requests from within or outside your country of residence. This may include disclosing your personal information to government or law enforcement agencies, or private parties, when we have a good faith belief that disclosure is required by law or when we, in our discretion, believe that

disclosure is necessary to protect our legal rights, or those of third parties and/or to comply with a judicial proceeding, court order, fraud reduction or legal process served on us. In such cases, we may raise or waive any legal objection or right available to us. These uses of your data are in our legitimate interests of protecting our business security. We may also use your data and share it with the recipients listed in this Privacy Policy for the purpose of complying with our legal obligations.

The lawful bases for sharing and processing this data is set out in the table below and please refer to the External Third Parties listed in the Glossary for further information.

5. 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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

See the Glossary at the end of this Privacy Policy to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

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 may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data collected	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Profile	Performance of a contract with you.
To process and deliver your order, including: a. managing payments, fees and charges; and b. managing your queries through our Customer Service team	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you. We may also use some of the data related to your queries for our legitimate interests of ensuring our customer service quality standards are met.
To collect and recover money owed to us in respect of your order	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for our legitimate interests (to recover debts due to us).
To notify you in relation to our legal obligations and documents, including changes to our terms or Privacy Policy	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests of ensuring our customers are updated on these changes.
To help us improve our offering to our customers, including asking you to leave a review or take a survey, or provide customer insights	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to improve our offering to our customers, to develop them and grow our business).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business, and to improve our offering to you).

We do not conduct any automated decision making. We may on occasion profile our customers for the purposes of targeting marketing at them and where this is done, this is undertaken for our legitimate interests of ensuring our marketing is relevant to its audience. For example, we may classify an appropriate audience for a promotion by what products they have previously ordered or expressed an interest in. We do not conduct any online behavioural tracking.

MARKETING

We may use your Identity, Contact and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. We only use the data you provide to us directly for this purpose along with the Aggregated Data.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We generally only send electronic marketing - such as email marketing - to people who have previously bought similar products from us and this is in our legitimate interests. We will always offer a way out of receiving this marketing when you first purchase our products and in every marketing communication afterwards. We may on occasion send out postal marketing or conduct telephone marketing for the purpose of growing our sales which is in our legitimate interests and in this scenario we will rely on you to let us know if you do not want to receive this by opting out of marketing (see Opting out below).

OPTING OUT

You can ask us to stop sending you marketing messages at any time by using our [Website Contact Us](#) page or by replying to any marketing message sent to you at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, or related correspondence, and we will continue to process such data in accordance with this Privacy Policy and only ever as permitted by law.

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 [contact us](#).

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.

6. DISCLOSURES OF YOUR PERSONAL DATA

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and they may only use your data for the purposes we specify in our contract with them. We will always work with them to protect your privacy.

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.

You acknowledge that the Internet is not a completely secure medium for communication and, accordingly, we cannot guarantee the security of any information you send to us (or we send to you) via the Internet. We are not responsible for any damages which you, or others, may suffer as a result of the loss of confidentiality of such information.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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. For example, details of your orders will be kept for as long as we need to retain that data to comply with our legal and regulatory requirements. This is generally 7 years unless the law prescribes a longer period.

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

Under certain circumstances, you have rights under UK data protection laws in relation to your personal data.

You have:

- **The right to be informed** – Detailed within this privacy policy.
- **The right of access** – You can make a subject access request by contacting us via our web site or by your normal preferred communication method with us.
- **The right to rectification** – Any errors can be corrected by contacting us via our web site or by your normal preferred communication method with us.
- **The right to erasure** – You can request your personal data to be erased by contacting us via our web site or by your normal preferred communication method with us.
- **The right to object** – You can object to direct marketing or the processing of your data by contacting us at any time via our web site or by your normal preferred communication method with us.

If you wish to exercise any of these rights, please contact us via our web site or by your normal preferred communication method with us, marking your query Data Protection.

NO FEE USUALLY REQUIRED

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 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. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and 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).

Performance of Contract 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.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

EXTERNAL THIRD PARTIES

Partners - when you place an order, your information is entered and stored on our job tracking database and accounting system ("Partner") so that we can process and deliver your order.

Cloud storage providers - we use cloud computing platforms that securely store all of our data, including customer details.

Email service providers - in order to send you marketing content and transactional emails, we share your details with our email service providers.

Payment providers - in order to facilitate any payments taken over the telephone, we facilitate the sharing of your Financial Data with payment providers.

Delivery providers - in order to package and mail items to you, it is necessary to share your information with delivery providers.

Completion document - when we finalise your order, we use a third party system to take a signature, photographs and / or videos on a completion form on our behalf.