

# Privacy Policy – Mereway – New

## 1. IMPORTANT INFORMATION AND WHO WE ARE

Mereway Group are committed to complying with the General Data Protection Regulation and the Data Protection Act 2018, once enacted. Looking after the personal information you share with us is very important, and we want you to be confident that your personal data is kept safely and securely and to understand how we use it to offer you a better and more personalised shopping experience.

We have published this notice to help you understand:

- how and why Mereway collect information from you;
- who we share your information with, why and on what basis; and
- what your rights are.

If we make changes to this notice we will notify you by updating it on our website. Mereway will be what is known as the ‘Data Controller’ of the personal data you provide to us, and we will sometimes refer to ourselves in this notice as “we” or “us”. By Data Controller, this means Mereway determines the purposes and way in which any personal data are, or will be, processed.

Should you need to contact us please write to:  
Mereway Kitchens, Marketing Department, Redfern Parkway, Tyseley, Birmingham, B11 2BF

or via [dataprotection@mereway.co.uk](mailto:dataprotection@mereway.co.uk) quoting Privacy Policy Enquiry.

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

### THIRD-PARTY LINKS

This 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 notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Whether you are downloading or ordering a brochure, or searching for your nearest retailer with one of our third party retailers, we will ask you for:

- your name
- your postal address
- your telephone number
- your email address

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. For more information on IP addresses, read our Cookie Policy.

We may also collect sensitive personal information, where reasonably required, to ensure we comply with our legal requirements.

We may collect and process the following personal data about you:

- Information that you provide to us by filling in forms on our website
- In the course of supplying our goods to you
- If you contact us, we may keep a record of that correspondence
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them
- Details of your visits to our websites including, but not limited to, traffic data, location data, weblogs, and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access

## 3. HOW PERSONAL DATA IS COLLECTED AND WHY WE NEED IT

We collect data on our website via the following forms:

### **BROCHURE REQUESTS**

We need your name, postcode, postal address, phone number and email address so that we can process and send out your brochure order, and/or advise you of any offers, promotions and news we think you would be interested in and forward your enquiry on to your nearest third-party retailer of Trend, if you consent to us doing so. You will be able to unsubscribe from this activity at any time.

### **FIND A RETAILER**

We need your postcode in order to display your nearest third party Trend retailer. This data is provided anonymously and is used strictly to display your nearest Trend retailer, and may also be used for analytics purposes.

## **4. HOW DO WE USE YOUR INFORMATION?**

Data Protection says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of these reasons and these are:

- Contract - your personal information is processed in order to fulfil a contractual arrangement e.g. in order to send you your brochures.
- Consent - where you agree to us using your information in this way e.g. for storing your payment card details.
- Legitimate Interests - this means the interests of Mereway in managing our business to allow us to provide you with the best products and service in the most secure and appropriate way e.g. to transfer your data to certain Third Party's such as delivery partners.
- Legal Obligation - where there is statutory or other legal requirement to share the information e.g. when we have to share your information for law enforcement purposes.

We will only disclose any information you provide to us to our network of approved retailers for operational purposes, if you consent to us doing so. We will not pass on your details to other companies for marketing purposes.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- To allow you to participate in interactive features which are sponsored or supplied by third parties

If our business or substantially all of its assets are acquired by a third party, in which case personal data held by us about our clients and customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, our clients, customers, or

others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, 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) Technical	(a) 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)

		(b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## 5. WHO WE SHARE YOUR INFORMATION WITH AND WHY

Mereway works with a number of trusted suppliers, agencies and businesses in order to provide you with the high-quality goods and services you expect from us such as delivery companies, credit reference agencies, independent retailers and market research companies amongst others.

Some examples of the categories of third parties with whom we share your data are:

### **Supplier Partners**

Mereway works with a number of trusted partners who supply products and services on our behalf. All partners are subject to thorough security checks, and will only hold the

minimum amount of personal information needed in order to fulfil the orders you place or provide a service on our behalf.

#### **Delivery Partners**

In order for you to receive your brochures or remedial items, Mereway works with a number of delivery partners. Again, we only pass limited information to them in order to ensure delivery of your items.

#### **IT Companies**

Mereway works with businesses who support our website and other business systems.

#### **Marketing Companies**

We work with marketing companies who help us manage our electronic communications with you or carry out surveys and product reviews on our behalf.

#### **Payment processing**

Mereway works with trusted third party payment processing providers in order to securely take and manage payments.

#### **Credit Reference Agencies**

When you apply for an account with us we will make searches about you with credit reference agencies. We do this to make sure customers who apply for accounts are able to manage the level of credit offered and not committing fraud by providing false or inaccurate information.

## **6. 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

## **7. SECURITY OF YOUR PERSONAL DATA**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure (password and firewall protected) servers. All electronic transactions you make to or receive from us will be encrypted (using SSL technology).

Of course, data transmission over the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data sent over the internet and transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

You are responsible for keeping your password and user details confidential. We will not ask you for your password.

### **Policy amendments**

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

## **8. WHAT ARE YOUR RIGHTS**

You are entitled to request the following from Mereway, these are called your Data Subject Rights and there is more information on these on the Information Commissioners website [www.ico.org.uk](http://www.ico.org.uk)

- Right of access -to request access to your personal information and information about how we process it
- Right to rectification -to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- Right to erasure (also known as the Right to be Forgotten) - to have your personal information erased. Contact Marketing on 0121 706 7844
- Right to restriction of processing - to restrict processing of your personal information
- Right to data portability - to electronically move, copy or transfer your personal information in a standard form
- Right to object - to object to processing of your personal information
- Rights with regards to automated individual decision making, including profiling - rights relating to automated decision making, including profiling

If you have any general questions about your rights or want to exercise your rights please contact [dataprotection@mereway.co.uk](mailto:dataprotection@mereway.co.uk)

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office (ICO), the data protection regulator in the UK, are available on the ICO website [www.ico.org.uk](http://www.ico.org.uk) where your personal information has or is being used in a way that you believe does not comply with

data, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have and also notify you of changes to our privacy policy by email.

## **9. HOW TO CONTACT US**

If you have any requests concerning your personal information or any queries with regard to these practices, please contact:

By email: **[dataprotection@mereway.co.uk](mailto:dataprotection@mereway.co.uk)**

By post: Mereway Kitchens, Marketing Department, Redfern Parkway, Tyseley, Birmingham, B11 2BF

By phone: 0121 706 7844