



## Privacy Policy

### WHAT PERSONAL DATA DO WE COLLECT?

First Class Plumbing and Bathroom Supplies Ltd, also referred to as First Class Ltd, may collect the following information about you:

- your name, age/date of birth and gender;
- your contact details: postal address including billing and delivery addresses, telephone numbers (including mobile numbers) and e-mail address;
- purchases and orders made by you;
- your on-line browsing activities on First Class Ltd's website;
- your password(s);
- when you make a purchase or place an order with us, your payment card details;
- your communication and marketing preferences;
- your interests, preferences, feedback and survey responses;
- your location;
- your correspondence and communications with First Class Ltd; and
- other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed or public Facebook page).

Our websites are not intended for children and we do not knowingly collect data relating to children.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you set up an on-line account on our website, or send an email to our customer services team. Other personal data is collected indirectly, for example your browsing or shopping activity. We may also collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources.

## **HOW WE USE YOUR DATA**

### **General**

First Class Ltd uses your personal data:

- to provide goods and services to you;
- to make a tailored website available to you;
- to manage any registered account(s) that you hold with us;
- to verify your identity;
- for crime and fraud prevention, detection and related purposes;
- with your agreement, to contact you electronically about promotional offers and products and services which we think may interest you;
- to enable First Class Ltd to manage customer service interactions with you; and
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

## **HOW WE PROTECT YOUR DATA**

### **Our controls**

First Class Ltd is committed to keeping your personal data safe and secure.

Our security measures include: -

- encryption of data;
- regular cyber security assessments of all service providers who may handle your personal data;
- regular scenario planning and crisis management exercises to ensure we are ready to respond to cyber security attacks and data security incidents;
- daily penetration testing of systems;
- security controls which protect the entire First Class Ltd IT infrastructure from external attack and unauthorised access; and
- internal policies setting out our data security approach and training for employees.

## YOUR RIGHTS

You have the following rights:

- the right to ask for a copy of personal data that we hold about you (the right of access);
- the right (in certain circumstances) to request that we delete personal data held on you; where we no longer have any legal reason to retain it (the right of erasure or to be forgotten);
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you (the right of rectification);
- the right to opt out of any marketing communications that we may send you and to object to us using / holding your personal data if we have no legitimate reasons to do so (the right to object);
- the right (in certain circumstances) to ask us to 'restrict processing of data'; which means that we would need to secure and retain the data for your benefit but not otherwise use it (the right to restrict processing); and
- the right (in certain circumstances) to ask us to supply you with some of the personal data we hold about you in a structured machine-readable format and/or to provide a copy of the data in such a format to another organisation (the right to data portability).

If you wish to exercise any of the above rights, please contact us using the contact details set out below.

### **First Class Plumbing and Bathroom Supplies Ltd**

16/17 The Parade, Brighton Road, Burgh Heath, Surrey, KT20 6AT

01737373148

[Sales@firstclassbathrooms.com](mailto:Sales@firstclassbathrooms.com)

[www.firstclassbathrooms.com](http://www.firstclassbathrooms.com)