

PRIVACY POLICY

Introduction

Welcome to CR Smith's privacy notice.

CR Smith respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE
2. THE DATA WE COLLECT ABOUT YOU
3. HOW IS YOUR PERSONAL DATA COLLECTED
4. HOW WE USE YOUR PERSONAL DATA
5. DISCLOSURES OF YOUR PERSONAL DATA
6. INTERNATIONAL TRANSFERS
7. DATA SECURITY
8. DATA RETENTION
9. YOUR LEGAL RIGHTS
10. TELEPHONE CALLS
11. GLOSSARY

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how CR Smith collects and processes your personal data. Further details are provided at 3 below as to how we collect your data, as this could occur in several ways (for example through use of this website or otherwise, when you submit an enquiry or are diverted to us, express an interest in our products or services, sign up to our newsletter, purchase or receive a product or service, or take part in a competition or market research).

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using

your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

CR Smith (**Group**) is made up of different legal entities, further details of which are listed below at “**Internal Third Parties**”. This privacy policy is issued on behalf of the Group so when we mention “CR Smith”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the Group responsible for processing your data.

For example:

- **Buying for your own home.** If you are a consumer and are buying (or thinking of buying) products such as windows and/or doors (or services, such as repair services via FIX from CR Smith) for your home, it is most likely that CR Smith Glaziers (Dunfermline) Limited is the data controller and responsible for your personal data.
- **Buying for a business.** If you are a sole trader, business or buying to renovate a property that is not your home, either CR Smith Manufacturing Limited or CR Smith Glaziers (Dunfermline) Limited will be the data controller – please see the contract in place for further details.
- **Tenant of certain properties receiving products / services.** If you are a tenant within social housing or a local authority home, in the majority of cases CR Smith Glaziers (Dunfermline) Limited and/or CR Smith Manufacturing Limited will act as a *data processor* on behalf of the organisation which purchases goods and/or services from the relevant CR Smith company. However, we may act as a data controller (or joint data controller) in respect of certain types of information for a period of time (for example where we require access to carry out works, in the case of complaints/disputes, or where you interact publicly with CR Smith on a review site etc).

Please see the Glossary and “Internal Third Parties” for details of the other relevant CR Smith companies and associates which may process your data either as joint controllers or sub-processors, this privacy notice is issued on behalf of all of those relevant companies.

Who is responsible for this website?

CR Smith Glaziers (Dunfermline) Limited is the controller and responsible for this website. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

Full name of legal entity: CR Smith Glaziers (Dunfermline) Limited

Email address: info@crsmith.co.uk

Postal address: Gardeners Street, Dunfermline, KY12 0RN

Telephone number: 01383 732181

Should you have a complaint about a data protection issue in connection with CR Smith, 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 (www.ico.org.uk). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand (the ICO will expect you to have done this before reviewing your complaint). You can click here to view our complaints policy.

Changes to the privacy notice and your duty to inform us of changes

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

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

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 as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender. Date of birth data is occasionally requested in order to carry out credit checks or to identify homeowners.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from our customer and other details of products and services that have been (or are being) purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and any log in details (where relevant), purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us (where you are a customer / potential customer) and our third parties and more generally your communication preferences in relation to said marketing.
- **Communications Data** includes your communication preferences (for example if you would rather be contacted by phone or email) for any services being provided to you or where you require to provide access (for example to allow us to provide services to your landlord).

We also collect, use and share **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 accessing a specific website feature. 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 notice.

Ordinarily, we do not seek to 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 seek to collect any information about criminal convictions and offences. However, from time to time we may receive and control your Special Category Data, where this is relevant to the work we are carrying out and/or in accordance with our Vulnerable Persons Policy and best practice. This could arise either through information you tell us, that is detailed to us by third parties (such as a trusted adviser, local authority or housing association) or that we obtain during the course of providing yourself or our customer with goods and/or services. For example, if you have specific product requirements related to your health (such as a lowered door threshold) or where yourself or a resident is classed as vulnerable and we require to take extra steps or precautions in light of that vulnerability.

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 either enter into with you or fulfil (for example, to provide you or your residence with goods 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, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - submit an enquiry;
 - express an interest in our products or services (for example to one of our representatives at a home improvement store such as B & Q or Homebase, or at a trade exhibition show such as the Ideal Home Show);
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or give us some feedback
- **Automated technologies or interactions.** As you interact with our website or with landing pages elsewhere, we may automatically receive or collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by

using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - analytics providers such as Google based outside the UK and EU;
 - advertising networks such as Google based outside the EU; and Facebook based outside the EU.
 - search information providers such as Google.
- Contact, Identity and Communications Data from local authority and/or housing associations in relation to individuals residing in their properties. In such cases, we will have a contract with the local authority and/or housing associations to supply their property with goods and/or services (and as such, we are required to liaise with relevant residents for access etc). Occasionally we may receive special category data where this is relevant to the work being carried out.
- Contact, Identity and Communications Data from third party referrers, where for example, you have asked to be put in touch with us or made a query through a third party.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Worldpay (UK) Limited; credit reference agencies including CallCredit, Equifax and Experian; finance providers such as Mitsubishi HC Capital UK PLC trading as Novuna, Clydesdale Financial Services Limited trading as Barclays Partner Finance, Shawbrook Bank Limited (all of which we understand are based in the UK) but also fraud prevention agencies.
- Identity and Contact Data from data brokers or aggregators such as Quotatis Limited or Digitonic Limited (both based in the UK).
- Identity, Contact and Transaction Data from review sites such as Trust Pilot A/S (based in Denmark, in the EU) but also (if you share information in relation to us and/or the Transaction on these sites) from general social networks such as Facebook, Google+/Google LLC and Twitter (all based in the USA).
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register (both based inside the UK).
- Identity, Contact and Transaction Data from regulators or registries such as the Information Commissioner's Office, the Financial Ombudsman or the Telephone Preference Service (based in the UK).

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:

- 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.

Click here to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we rely on consent or legitimate interests as a legal basis for processing your personal data in relation to sending direct marketing communications, our principal mode of contact would be by telephone and/or email, but we always take your preferences into account. You have the right to withdraw consent to marketing at any time by completing our opt-out form.

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 plan to 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/activity	Type of data	Lawful basis for processing including basis of legitimate interest
To take steps to or to:	(a) Identity	(a) Consent
(a) Answer queries or provide requested information	(b) Contact (c) Financial	(b) Necessary for our legitimate interests (for running our business; meeting customer and individual expectations (including that some individuals prefer to take time to consider the purchase of significant home improvement products and to be kept updated of price or product developments) to keep our records updated and to study how customers use our products/services, to develop them; to grow our business and to inform our marketing strategy)
(b) Take measurements or obtain further information in relation to the products and/or relevant services sought	(d) Transaction (e) Profile (f) Usage (g) Marketing and Communications	
(c) Provide quotations or further information in relation to those quotations		

Purpose/activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>For our consumer customers, to carry out credit checks (whether this is required by ourselves or by third party finance providers who you may have chosen to pay for the products) and for the purpose of preventing fraud.</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile (f) Usage (g) Marketing and Communications (h) Technical Data 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (for running our business; maintaining individual expectations (if you have, for example, requested third party finance); provision of administration and IT services; network security; to prevent fraud) <p>In relation to credit checks, we may make enquiries about your credit worthiness and we may terminate the contract if, acting reasonably, we believe you may not be able to pay the contract price. If you require loan finance we may pass your personal information to the credit reference agency or credit provider who may use automated processing and/or profiling in relation to your personal information. You may object to this but, if we require a credit check, this may mean that we are unable to fulfil your contract. Whether you require finance or not, we may provide personal information to credit reference agencies and they may keep a record of any search that they do.</p>
<p>To register you as a new customer.</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests
<p>To process and deliver your order (or that of our customer / your landlord) including:</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

Purpose/activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	
<p>To process and deliver your order (or that of your landlord) including:</p> <p>(a) Ensuring we have the correct details to provide our goods and/or services</p> <p>(b) Ensuring we have sufficient staff for the relevant order</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Communications</p>	<p>(a) Necessary for our legitimate interests (for running our business);</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p> <p>(e) Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To allow access to your home or that of your landlord (for example to arrange a time to take measurements, start the installation process or provide services, replacement parts etc).</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Communications</p>	<p>(c) Necessary for our legitimate interests (for running our business);</p> <p>(d) Necessary to comply with a legal obligation</p>

Purpose/activity	Type of data	Lawful basis for processing including basis of legitimate interest
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 online and offline content and advertisements and measure or understand the effectiveness of the advertising we serve to our customers and potential customers.	(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).
Where you are a customer or potential customer, to make	(a) Identity (b) Contact	Necessary for our legitimate interests (for running our business; meeting individual expectations (such as to

Purpose/activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>suggestions and recommendations to you about goods or services that may be of interest to you.</p>	<p>(c) Technical (d) Usage (e) Profile (f) Marketing and Communications (g) Communications</p>	<p>be advised of offers or price or product development or changes in building or safety standards); to keep our records updated and to study how customers use our products/services, to develop them; to grow our business and to inform our marketing strategy).</p>
<p>To maintain our obligations under the guarantee.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(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; maintaining individual expectations; and to study how customers use our products/services, to develop them; to grow our business and to inform our marketing strategy)</p>
<p>To contact you after your guarantee has expired</p>	<p>(a) Identity (b) Contact (c) Transaction (d) Profile (e) Usage (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (for running our business; meeting individual expectations (such as to be advised of the expiry of the guarantee (whether the guarantee was for 6 months, a year or 10 years), of offers or price or product development or changes in building or safety standards); to keep our records updated and to study how customers use our products/services, to develop them; to grow our business and to inform our marketing strategy).</p>
<p>To notify you (or the residents at which the products are installed) of unforeseen circumstances or</p>	<p>(a) Identity (b) Contact (c) Transaction</p>	<p>(a) Necessary to protect someone's vital interests (this means an interest which (i) may arise under a current or future legal or statutory obligation but (ii) given the long lifespan of our</p>

Purpose/activity	Type of data	Lawful basis for processing including basis of legitimate interest
developments in relation to the products.	(d) Profile (e) Usage	<p>products may also include unforeseen circumstances or developments in the standards, state of engineering and design knowledge and practices of our industry or concerning products we have previously fitted which may not legally oblige us to take action or notify you of those circumstances or developments but which we regard as important or vital enough to justify us contacting you or the residents or future owners of your home. This includes health and safety or security concerns, product recalls or where we discover a supplier has breached our specifications and supplied something which was sub-standard, in order that we can replace those items to avoid injury or loss)</p> <p>(b) Necessary to comply with a legal obligation (for example product recalls)</p> <p>(c) Necessary for our legitimate interests (for running our business; to keep our records updated; maintaining individual expectations; and to study how customers use our products/services)</p>

Marketing

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

Promotional offers from us

Where you are a current or potential individual customer of CR Smith, we may use your Identity, Contact, Technical, Usage 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 call this marketing).

You will receive marketing communications from us if you have expressed an interest in our products or services or requested information from us, or purchased goods or services from us, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the CR Smith group of companies for third-party marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by completing our opt-out form at any time. You can opt in and out of marketing messages as many times as you wish.

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, guarantee registration, product/service experience, other transactions, for purposes other than marketing (such as those listed above or where you subsequently request further information, quotes etc).

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.crsmith.co.uk/cookie-policy/>.

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.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- 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 privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Our third-party service providers are only provided with your personal data for specified purposes and are required to process personal data in accordance with our instructions. Please note however, that if you are or want to be a customer we may make enquiries about your credit worthiness and we may terminate the contract if, acting reasonably, we believe you may not be able to pay the contract price. If you require further information, please refer to Equifax's CRAIN at the following link <https://www.equifax.co.uk/privacy->

[hub/crain](#). If you require loan finance we may pass your personal information to the credit reference agency or credit provider who may use automated processing and/or profiling in relation to your personal information. You may object to this but, if we require a credit check, this may mean that we are unable to fulfil your contract. Whether you require finance or not, we may provide personal information to credit reference agencies and they may keep a record of any search that they do.

Please also note that the credit provider will have their own privacy policy, and depending on how you interact with that credit provider (e.g. should you decide to become a customer of theirs) – your personal data will likely be collected by that credit provider and be governed by their privacy statements. We only provide personal information to credit providers as detailed in 4 (for example at your request, as part of our legitimate interests or to comply with our legal obligations), we are not responsible for the credit provider's behaviour, their third-party websites, their products or their privacy statements and again would encourage you to read their privacy notices.

6. International Transfers

We share your personal data with certain CR Smith companies (see Internal Third Parties below), this will not involve transferring your data outside the UK or European Economic Area (EEA).

The majority of our external third parties are based within the European Economic Area (EEA) so their processing of your personal data should not involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we seek to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, such as Typeform, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.
- Where the data being transferred is not repetitive, involves data related to only a limited number of individuals, is necessary for our legitimate interests and is made subject to suitable safeguards to protect the personal data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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.

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see “Request erasure” 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 data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

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. Telephone calls

Please note that all calls are recorded for record keeping, training and security purposes.

11. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#)

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

Internal third parties

These include the various companies within the CR Smith Group, which may be related to each other and act as joint controllers, processors, and/or sub-processors.

This includes CR Smith Glaziers (Dunfermline) Limited, CR Smith Manufacturing Limited, C & C 23 Limited, and Cairnsmill Limited and who are all based in the UK. These companies provide services such as manufacturing, IT and system administration services, management, planning and decision making and undertake leadership reporting.

External third parties

- Service providers acting as processors based in the UK who provide services, whether as suppliers, subcontractors, contractors or agents for the purpose of any contract we enter into with them or you. For example this includes:
 - Payment service providers (such as WorldPay who will process payments);
 - Credit reference agencies (such as CallCredit, Experian and Equifax);
 - Finance providers (such as Novuna, Barclays Partner Finance, Shawbrook, Creation Finance);
 - Fraud prevention agencies;
 - Technology, IT and system administration services (who provide us with database hosting, server access and general IT support and maintenance);
 - External specialist services (such as engineers, surveyors, architects, sales agents and representatives);
 - Suppliers who provide us with labour, goods and/or materials to fulfil your contract (including Solidor who supply us with materials from time to time and Subcool who provide services in relation to climate control, Russells or Morrows or J+M Murdoch who provide skip hire, Travis Perkins or Beatons who provide building materials, Speedy Hire or Travis Perkins who provide equipment hire);
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- Local authorities, HM Revenue & Customs, regulators such as the Financial Ombudsman and the Information Commissioner and other law enforcement or authorities where required or permitted by law and whether acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Social media and/or review sites (but only where you share information in relation to us and/or the Transaction on these sites and we respond to that disclosure) such as Facebook, Google+/Google LLC and Twitter.
- Advertising providers (such as Sky UK Limited and STV Central Limited who provide us with analysis to understand the effectiveness of our advertising).
- To understand the effectiveness of our advertising, our appointed third-parties may share data with the following. This data, however, will be pseudonymised and will only be retained by the third-party for the period of the data analysis:
 - a) Google Ireland Limited
 - c) Virgin Media Limited and its Affiliates
 - d) Experian Limited
 - e) contractors who are natural persons who perform roles solely for the benefit of our appointed third-parties
 - f) TechEdge
 - g) Adobe Systems Software Ireland Limited
 - h) Onesoon Limited
 - i) Sub-processors:
 - Kochava Inc.

- other specified sub processors as appointed by our contractors

Your legal rights

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.