

# Privacy Notice

## Introduction

Chepstow Plant International (referred to in this notice as “us”, “we” or “our”) respects your privacy and is committed to protecting your personal data. We comply with all aspects of the UK’s data protection legislative framework, which includes the European General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

In the course of running our business, we gather the business contact information of our customers and suppliers. Although this is business contact information, we recognise that this nevertheless constitutes personal data. We have therefore developed this Privacy Notice in order to be as transparent as possible about the personal information we collect and use.

We ask that you read this privacy notice carefully as it contains important information about:

- The personal information that we collect and use
- The lawful basis we rely on to collect and use it
- Why we collect and use personal information
- Where we get the personal information from
- With whom we share personal information
- How long we keep information and how we ensure it is secure; and
- Your privacy rights

It is important that you read this privacy notice together with any other privacy 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.

This privacy notice does not apply to our current or former employees, or to people who apply to work for us. If you are interested in working for us, please read the Privacy Notice that applies to you.

## Data Controller

Chepstow Plant International Limited is the controller and responsible for your personal data. This Privacy Notice is issued on behalf of Chepstow Plant International Limited and other companies that are in the same corporate group including Beacon Estates Developments Ltd, Beacon Estates (Chepstow) Limited and Chepstow Construction and Maintenance Limited. Information is shared between the companies. We are not required to appoint a Data Protection Officer under the GDPR. However, queries or concerns relating to personal data should instead be directed to Ross Hayward, Head of Assets and Commercial.

## Categories of Personal Information that we hold

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).

The personal information that we collect includes:

- Identity data such as your name, username or similar identifier, marital status, title, date of birth and gender.
- Contact data including your address, employer's address, email addresses and telephone numbers.
- Professional information such as details of your employer and job title.
- Financial data including bank account and payment card details.
- Transaction data including details about payments to and from you.
- Profile data such as the products you have purchased or made enquiries about.
- Technical data such as 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 together with information about how you use our website and other digital channels.
- Marketing data including your preferences in receiving marketing from us and your communication preferences.

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.

### Sources of Personal Data

We collect information about you in the following ways:

- Directly when you correspond with us by post, phone, email or otherwise, create an account on our website, subscribe to our newsletters, enter a competition, or complete a survey or give us some feedback.
- When you use our website, we collect your personal information by the use of “cookies” and other tracking methods.
- We also generate personal information about you when we record your engagement with us and we may supplement information about you with information from publicly available sources.

### The lawful basis for processing personal information.

We will only use your personal data when the law allows us to. Most commonly, we rely on the following legal basis to process your personal information:

Performance of a contract	This applies where we need to collect and use your personal information in order to take steps to enter into a contract with you or to perform our obligations under a contract with you
Legal obligation	This applies where we need to collect and use your personal information to comply with applicable laws and regulatory requirements
Legitimate interests	We may collect and use your personal information to further our legitimate business interests. We only do this where we are satisfied that your privacy rights are protected satisfactorily. You have a right to object to any processing of your personal information based on this legal basis (see below)
Consent	Generally we do not need to rely on consent as a legal basis for processing your personal data, but where we do, you have a right to withdraw consent at any time

Certain types of personal information are in a special category under data protection laws, as they are considered to be more sensitive. Examples of this type of data include information

about health, race, religious beliefs, political views, trade union membership, sex life or sexuality and genetic/biometric information. We only collect this type of information about you where there is a clear reason for us to do so and it is lawful.

### Why do we collect and use personal information?

We collect and use personal information for the following purposes, relying on the specific lawful basis set out in the table below. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To provide goods or services to you or your employer	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to facilitate our relationship with your employer)</li> </ul>
To make and manage payments, including collecting payments due to us	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
To manage our relationship with you or your employer including dealing with any queries or complaints you may have	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>
To carry out the day-to-day operations of our businesses efficiently including managing our financial positions, business capability, planning, communications, corporate governance and audit	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (the management of our businesses)</li> </ul>
To administer and protect this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and our digital platforms	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (provision of administration and IT services, network security, to prevent fraud)</li> <li>• Necessary to comply with a legal obligation</li> </ul>

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>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)</li> </ul>
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>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)</li> </ul>
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to develop our products/services and grow our business)</li> </ul>

### 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, to provide you 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.

### Marketing and Promotional Offers

You will receive marketing communications from us if you have requested information from us or purchased good or services from us and you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or at any time.

We do not sell, rent or otherwise make personal information commercially available to any third party for marketing purposes.

## Sharing your personal data

We use a number of third party providers to help us run our businesses. Such suppliers may have access to your personal information or we may share or send it to them. This includes IT and system administration services, professional advisers including lawyers, bankers, auditors and insurers and regulators and other authorities.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## Transfers Outside the European Economic Area (EEA)

We do not share your data with bodies outside of the European Economic Area.

## How long do we keep personal information

Our policy is to not hold personal information for longer than is necessary and for up to 7 years. We have established data retention timelines for all of the personal information that we hold based on why we need the information. The timelines take into account any statutory or regulatory obligations we have to keep the information, our ability to defend legal claims, our legitimate business interests, best practice and our current technical capabilities.

## Security

We are strongly committed to information security and we take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration or corruption. We have put in place physical, electronic, and managerial procedures to safeguard and secure the information you provide to us including the use of encryption and pseudonymisation.

## Individual Rights

You have a number of rights in relation to your personal data which we have. Not all of the rights apply in all circumstances. If you wish to exercise any of the rights, please contact us in the ways detailed below:

- You have a right of access to the personal information we hold about you
- You have the right to ask us to correct any information we hold about you that you think is wrong or incomplete
- You have the right to object to any processing of your personal information where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop. There may, however, be legal or other legitimate reasons why we need to keep or use your information. If this is the case, we will consider your request and explain why we cannot comply with it. You can ask us to restrict the use of your personal information while we are considering your request.
- You have the right to object if we process your personal data for the purposes of direct marketing. If you no longer want to receive communications from us, please contact us. We will stop sending you communications but will continue to keep a record of you and your request not to hear from us. If we deleted all of your information from our direct marketing databases, we would have no record of the fact that you have asked us not to communicate with you and it is possible that you may start receiving communications from us at some point in the future, if we obtain your details from a different source.
- You have the right to ask us to delete your information. This is also known as the right to be forgotten or to erasure. We will not always agree to do this in every case as there may be legal or other legitimate reasons why we need to keep or use your information. If this is the case, we will consider your request and explain why we cannot comply with it. You can ask us to restrict the use of your personal information while we are considering your request.
- Where our processing of your personal information is based on your consent, you have the right to withdraw it at any time. Please contact us if you wish to do so.
- You may have a right to obtain the personal information that you have given us in a format that be easily re-used and to ask us to pass this personal information on in the same format to other organisations. Please contact us to find out if this right applies to you.

## How to Complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us the following ways:

- +44 (0) 1291 430028
- [workflow@chepstowplant.com](mailto:workflow@chepstowplant.com)
- You also have the right to complain to the Information Commissioner. Find out on their website how to report a concern. (<https://ico.org.uk>).

## Changes to this Privacy Notice

This privacy notice was last updated on 5<sup>th</sup> August 2021. We keep this privacy notice under regular review and may change it from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We would encourage you to check this privacy notice for any changes on a regular basis.