

Privacy Policy

Introduction

ORNATE GROUP LTD, trading as OG Flooring Supplies (referred to as "OG", "we", "our" or "us" in this privacy policy), respect the privacy rights of its online visitors/customers (referred to as "you", "your", or "yours") and recognise the importance of protecting the information collected about them. We will only ever use the information that we collect about you lawfully and in your best interests.

OG is committed to the protection of any personal information you share with us. This statement describes what types of personal data we collect from you, how it is used, how we share it with others, how you can manage the information we hold and how you can contact us should you have any questions.

The information within this policy is subject to change, so you may wish to revisit this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes. Our Privacy Policy will always be available on our website, providing transparent and clear information regarding how we process your personal data.

The following information is provided by us to enable our online visitors and customers to be fully informed and assured that our company privacy policies are in line with all laws governed by and construed in accordance with the laws of Great Britain. By visiting <http://www.ornategroup.co.uk/> you are accepting and consenting to the practices described in this Privacy Policy.

This version of our Privacy Policy applies from 06 DEC 2017.

What Information Do We Collect?

We only collect information that is necessary and relevant in order to provide you with the products or services you request.

What Kinds of Personal Data Do You Need to Share?

We may ask you for certain personal data when you order from us, including when you purchase from the website or in-store, as well as when you sign up to our mailing list.

The information we collect includes but is not limited to;

- *Name (including title)*
- *Delivery address*
- *Billing address*
- *Payment card details*
- *Phone number*
- *Date of birth*
- *Email address*

What Personal Data Will We Receive from Other Sources?

We sometimes obtain information about you or your purchases from other third parties.

These companies have their own privacy policies explaining how they use and share your personal data. You should carefully review these privacy policies prior to engaging with the third party, in order to ensure that you are happy with them.

What Personal Data Will We Collect About You?

We will collect certain information when you use OG's websites and applications as well as our customer care centre. Some of this data does not identify you personally, but rather provides us with information about how you

use our services and engage with us. This enables us to improve our services and make them more useful to you.

The Information We Collect Includes, But is Not Limited To:

- *The date and time you used our services*
- *The pages you visited on our website and how long you visited us for*
- *The products you viewed or added to your basket*
- *Your IP address*
- *Your location (where you have permitted access to this)*
- *The Internet browser and devices you are using*
- *Cookie or pixel information (for more information please see our Cookie Policy)*
- *Any information within correspondence you send to us*

Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses), and company details (some of which we may obtain from an online or public business directory).

How Do We Use This Information?

OG will only process information that is necessary to provide the product or service for which it has been collected. We will always provide the option for you to choose not to receive marketing communications from us, and you can withdraw your consent at any time should you change your mind. We will never send you unsolicited 'junk' email or communications or share your personal information with anyone else who might.

Outlined below are the various ways in which we may use or process your personal data.

Consent

Where you have provided your consent, we may use and process your information to contact you through electronic channels such as email or SMS about promotions, events, products, services or information which we think may be of interest to you.

You can withdraw your consent at any time by emailing accounts@gowling.co.uk or, in relation to any marketing messages you receive, by selecting the unsubscribe option included in those messages.

Contractual performance

We may use and process your personal data where necessary in order to perform a contract, such as to fulfil and complete your orders and purchases.

Legal obligation

We may process your personal data to comply with any legal and/or regulatory requirements.

Vital interest

We may need to process your personal data to contact you should there be an urgent safety or product recall notice that we need to inform you of.

Legitimate interests

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing Necessary for Us to Support Customers with Sales and Other Enquiries

In order to support sales and/or queries, we may use your information;

- To respond to any correspondence you send, or to fulfil any requests you make. For example, sending you information about a product or responding to a customer service query.

Processing Necessary for Us to Understand and Respond to Customers' Needs

To develop and improve our relationship with you, we may use your information;

- To analyse, evaluate and improve our products and services, including use of our website, applications, customer services and stores, in order to improve your customer experience. Where possible we will use data amalgamated from many people so that it doesn't identify you personally.
- To undertake market analysis and research, including contacting you with customer surveys, so that we can better understand you as a customer.
- To provide tailored offers, products and services by post that we think you will be interested in. We will only send email marketing communications to you if you have provided your consent for us to do so.
- We may use automated methods to analyse, combine and evaluate information that you have provided to us. We collect and analyse this information in this way so that we can deliver the most appropriate customer experience to you by tailoring, personalising and making relevant all our service and communications (for example, when we have a new arrival that we think you might like).

Processing Necessary for Us to Operate the Administrative and Technical Aspects of Our Business Efficiently and Effectively

To protect your personal information, we may use your data;

- To verify the accuracy of information that we hold about you and create a better understanding of you as a customer.
- For network and information security purposes, i.e. for us to take steps to protect your information against loss, damage, theft or unauthorised access.
- To comply with a request from you in connection with the exercise of your rights (for example, where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request).
- To inform you of updates to our terms and conditions and further policies.

Processing Necessary for Us to Promote Our Business, Brands and Products and Measure the Reach and Effectiveness of Our Campaigns

To support and promote Opulay, we may use your information;

- To send you marketing information after you have purchased a product or service from us, made a purchasing enquiry or closed your browser with items in your shopping basket. You have the right to opt out of us sending you this information at any time.
- As a business customer, acting on behalf of said business or where we have obtained your business contact details, we may contact you with marketing information (unless you object) if you have expressly indicated to us that you are acting on behalf of said business or where we have obtained your business contact details. In relation to any such information we send by email, we will include an option allowing you to object to receiving future messages by unsubscribing.
- To show you targeted advertising online through social media and other platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us.
- To identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information).
- To administer competitions and promotions that you enter with us and to distribute prizes.

How Do We Share this Information?

We do not, and never will, sell your information to third parties. However, we may from time to time disclose your information to the following categories of companies or organisations to which we pass the responsibility to handle services on our behalf;

Service providers who help us to operate our website and App, fulfil your orders and deliver our products to you, including;

- Credit reference agencies
- Couriers
- Payment providers
- IT support
- Direct marketing communications agencies and consultants
- Market research and market analytics service providers
- Legal and other professional advisors
- Certain regulatory bodies, government and enforcement agencies, where required
- Companies like Google/Facebook to show you products that might interest you while you're browsing the Internet. This is based on either your marketing consent or your acceptance of cookies on our website.

We take steps to ensure that any 3rd party partners who handle your information comply with data protection legislation and are as committed to the protection of your personal data as we are. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to make your data anonymous or use aggregated, none-specific data sets wherever possible.

Due to the international nature of our business, there may be some instances where your information is processed or stored outside of the EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

3rd Parties That We Use:

- *TNT*
- *Royal Mail*
- *The Pallet Network*
- *Google*
- *Barclaycard*
- *Microsoft Outlook*
- *WordPress*
- *Sage*

These third party companies will also use your personal data for a variety of reasons; if you ever wish to have your data removed please contact the data lead / Data Protection Officer and we will ensure that the data is removed permanently where possible, in-line with the latest GDPR requirements.

How Long Do We Keep Your Information For?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us, we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

How Can You Manage the Information We Hold About You?

You have the right as an individual to access any personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and, in certain circumstances, ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have several rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. We will respond to you within a month after we have received any request (including any identification documents requested).

When It Comes to Your Personal Information, You Have the Right To:

- Ask for a copy of the information that we hold about you
- Correct and update your information
- Withdraw your consent (where we rely on it)
- Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object
- Erase your information (or restrict the use of it), provided we do not have any lawful reason to continue to use and process that information
- Provide you your information in a structured data file, where we rely on your consent to use and process your personal information or need to process it in connection with your purchase

You can exercise your rights and/or manage your information by contacting us using the details below;

Ornate Group Ltd,
28 Lyon Road.
Industrial Estate
Kearsley
BL4 8ND

Email: info@ornategroup.co.uk
Phone: 01204862544