



# Strongbar Ltd: Privacy Notice

*Your privacy is of the utmost importance to us.*

This webpage sets out when and how we use your Personal Data that you or others provide to us, including through this website (the “**Website**”). We want to make sure you fully understand the terms and conditions surrounding the capture and use of that information.

This Privacy Notice describes what information we collect about you, how we use it, and the rights you have in relation to that collection and usage.

If you have any questions about this Privacy Notice, please contact our customer support team on [s.cobbe@strongbar.co.uk](mailto:s.cobbe@strongbar.co.uk).

## **OUR DETAILS**

**STRONGBAR LIMITED** is a private limited company incorporated and registered in England and Wales with company number 01773256 whose registered office address is Aylsham industrial Estate, Banningham Road, Aylsham, Norwich, NR11 6LP (“**Strongbar**”).

For the purposes of the Data Protection Act 2018, the General Data Protection Regulations and any other applicable data protection and privacy laws and regulations (“**Data Protection Legislation**”), Strongbar will be the ‘data controller’ for all Personal Data that we determine the means and purpose of processing.

By “**Personal Data**” we refer to information collected or held by Strongbar, that identifies and relates to you as an individual.

## **INFORMATION WE MAY COLLECT**

We will be required to collect Personal Data about you in the following circumstances.

### **When you purchase products from Strongbar**

When you contact Strongbar to provide our services we will collect certain Personal Data to enable us to complete your order. The information we will need to do this will include, your name, preferred contact details (email, phone, home or work address) and payment information.

We will also record information about the services you requested (including brochures or price lists).

We may collect additional information you volunteer to us when contacting us regarding any elements of our service. We will only retain the Personal Data pertinent to delivering services to you.

### **When you have expressed an interest in Strongbar services**

When you make an enquiry regarding any of the services provided by Strongbar, we will collect your name, email address, work or home postal address and contact details and information regarding the services you have requested information about. We will use this information to service your request.

If we have permission to contact you with marketing communications from us, we will handle your Personal Data (for example, your name, email address and postal address and telephone number) to provide you with promotional information and newsletters in line with any preferences you have told us about.

Every communication we send to you for marketing purposes will also contain instructions on how to unsubscribe from receiving them.

You are not under any obligation to provide us with your Personal Data for marketing purposes.

If we contact you as part of our after sales service, we do so under our legitimate interest to promote our business and with the intention of ensuring our customers receive a high standard of ongoing service. If you no longer wish to receive information from us after a quotation or sale, please inform us and we will immediately cease from contacting you.

You can tell us that you do not want your Personal Data to be processed in this way at any time by contacting us at [s.cobbe@strongbar.co.uk](mailto:s.cobbe@strongbar.co.uk) or, where relevant, by following the unsubscribe link shown in every marketing communication you receive from us. We will retain your data for as long as we have your consent and delete your Personal Data used for marketing purposes as soon as you withdraw your consent or unsubscribe from our newsletters and marketing information.

### **When you visit our website:**

We may also collect technical information about you when you visit the Website. This information may include the Internet protocol (IP) address used to connect your computer to the Internet, your browser type and version, time zone setting, operating system and platform, browser plug-in types and version, the full URL clickstream to, through and from the Website, page response times, download errors, length of visits to certain pages, page interaction (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page.

The collected information is used to provide an overview of how people are accessing and using the Website. It is not used for any additional purpose, such as to profile those who access the Website.

### **When you phone us**

When you phone us, we may also handle your Personal Data (your name, contact details and the other details you provide to us during the call) in order to service your enquiry or provide the customer services you have asked us to perform.

### **If you become a staff member or service provider of Strongbar**

If you apply to become a staff member, service provider or contractor at Strongbar, we will need to collect certain information from you to ensure we provide a safe environment for our customers, an adequate working environment for you and to enable us to perform our obligations to you under the contract of employment or the terms under which you have engaged with Strongbar. This information will include:

- Personal identifying information (name, address, employee/teacher number, NI number);
- Contact details (email, phone number, home address);
- Security and safeguarding information (relevant background information, references);
- Professional qualifications and work/CV history;
- Financial information to allow us to pay you (bank details, invoice information); and
- HR information (performance reviews, absence records, relevant sickness and health information and contract terms).

We will process this information under the lawful basis of requirement to perform the terms of your employment contract or service the agreement between yourself and Strongbar. If we are collecting sensitive information from or about you, we will always ensure that an exemption to the prohibition to processing such data always applies.

### **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. In this case, we may have to cancel the arrangement you have with Strongbar but we will notify you if this is the case at the time.

## **LEGAL BASIS OF PROCESSING**

We will only process your information for as long as we have a relevant legal basis to do so. Unless stated above in the "Information we may collect" section, this is in order to provide you with the contractual services you have requested from Strongbar or if you have provided us with adequate consent to process your information for other purposes.

If we choose to process your information under the legal basis of legitimate interests, we will always inform you of our legitimate business interest and your right to object.

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 your Personal Data has been used for a purpose other than its initial intended use and you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [s.cobbe@strongbar.co.uk](mailto:s.cobbe@strongbar.co.uk).

## **RETAINING YOUR PERSONAL INFORMATION**

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.

## **PROTECTING YOUR INFORMATION**

We are committed to ensuring that your information is secure and we have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we collect online.

All the Personal Data collected by us and stored electronically is held in the EEA only. We enforce physical access controls to our buildings and files and we authorise access to Personal Data only for those employees who require it to fulfil their job responsibilities.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

## SHARING YOUR INFORMATION WITH OTHERS

Please be assured that we will not share your information for any other reason unless we are required by law or permitted to do so under this Privacy Notice. The main circumstances in which we will be permitted or required to disclose this is by law will be by court order, to government bodies and law enforcement agencies. However, sometimes we may share your information with third parties in the following ways:

- we may use carefully selected sub-processors to help us collect, store or manage your information. This will always be managed under the terms of a written data processing agreement;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website; or
- if Strongbar Ltd is acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets. We process your Personal Data for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your Personal Data in this way, the relevant seller or buyer of our business may not be able to provide services to you.

We will only ever disclose the information necessary for our third party provider to perform their specific services and this will be conducted under a written agreement governing the usage of Personal Data.

## TRANSFER OF DATA OUTSIDE OF THE EU

We shall not transfer any Personal Data to any country outside of the European Economic Area unless we ensure that such Personal Data is subject to an adequate level of protection and appropriate legal safeguards in accordance with Data Protection Legislation.

## YOUR RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

You have the right to object to us handling your Personal Data when:

- we are handling your Personal Data based on our legitimate interests. If you ask us to stop handling your Personal Data in this way, we will stop unless we can show you that we have compelling grounds as to why our use of your Personal Data should continue; or
- where we process Personal Data for marketing purposes. If you ask us to stop handling your Personal Data on this basis, we will stop.

## YOUR RIGHTS UNDER DATA PROTECTION LAW

You can exercise the following rights to your data by contacting us at [s.cobbe@strongbar.co.uk](mailto:s.cobbe@strongbar.co.uk). We will only take instructions from you or your legal representative to effect or to alter a policy and we will protect your privacy when you contact us by asking specific and relevant questions to make sure we are speaking to you or your legal representative and not to an unauthorised person.

### Right of access

You are entitled to receive confirmation as to whether your Personal Data is being processed by us, as well as various other information relating to our use of your Personal Data. You also have the right to a copy of the Personal Data which we are handling regarding you.

### Right to rectification

You have the right to require us to rectify any inaccurate Personal Data we hold about you. You also have the right to have incomplete Personal Data we hold about you completed, by providing a supplementary statement to us.

### Right to restriction

You can restrict our processing of your Personal Data where:

- you think we hold inaccurate Personal Data about you;
- our handling of your Personal Data breaks the law, but you do not want us to delete it;
- we no longer need to process your Personal Data, but you want us to keep it for legal reasons; or
- we are handling your Personal Data because we have a legitimate interest you and are in the process of objecting to this use of your Personal Data.

Where you exercise your right to restrict us from using your Personal Data, we will then only process your Personal Data when you agree, except for storage purposes and to handle legal claims.

### Right to data portability

You have the right to receive the Personal Data we hold about you in a structured, standard machine readable format and to send this to another organisation controlling your Personal Data.

### Right to erasure

You have the right to require us to erase your Personal Data which we are handling in the following circumstances:

- we no longer need to use your Personal Data for the reasons we told you we collected it for;
- where we needed your consent to use your Personal Data and you have withdrawn your consent;
- you object to our use of your Personal Data and we have no compelling reason to carry on handling your Personal Data;
- our handling of your Personal Data has broken the law; or
- we must erase your Personal Data to comply with a law we are subject to.

### Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [s.cobbe@strongbar.co.uk](mailto:s.cobbe@strongbar.co.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### RIGHT TO COMPLAIN

You have the right to issue a complaint directly with the Information Commissioners Office, the data protection supervisory authority for England and Wales (<https://ico.org.uk/concerns/>).

### CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice at any time to ensure it always accurately reflects the way we collect, use and safeguard your Personal Data.

Please check this notice from time to time to ensure you are aware of any updates we may have made to our Personal Data handling practices. The date of the changes will be listed in the 'Last updated' section below. We will endeavour to notify all of our current clients of any updates to this notice via email and we will post the relevant announcement on our website homepage.

We recommend that you print a copy of this page for your reference.

### COOKIES

A cookie is a small data file that certain websites write to your hard drive when you visit them. The only Personal Information a cookie can obtain is information supplied by the user. A cookie cannot read data from your hard disk or read cookie files created by other sites.

You can refuse cookies by turning them off in your web browser and you do not need to have cookies turned on to successfully use our website. Most browsers are defaulted to accept and maintain cookies and you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or not.

We use the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

**Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Source	Cookie	Type	Purpose
Google Analytics	various	<a href="#">Performance</a>	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. <a href="#">Click here for an overview of privacy at Google</a>

### HOW CAN YOU MAKE A COMPLAINT?

Please note that if you are not satisfied with the processing of your Personal Data as set out in this Privacy Notice, please contact us at [s.cobbe@strongbar.co.uk](mailto:s.cobbe@strongbar.co.uk).

You have the right to issue a complaint directly with the Information Commissioners Office, the data protection supervisory authority for England and Wales (<https://ico.org.uk/concerns/>).

### CONTACTING US

Please contact us at [s.cobbe@strongbar.co.uk](mailto:s.cobbe@strongbar.co.uk) if you have any questions, comments or requests regarding this Privacy Notice.

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