



Privacy Policy

Issue date: March 2019

Prepared by: Data Protection Lead

Introduction

Welcome to the NP Group's Privacy Policy.

The NP Group contains the following companies: Norman Piette Limited, Alderney Gravel Company Limited T/A Blanchard Building Supplies Limited, KdeP Glass Limited, Annandale Limited, JecoHomes Limited and Annandale Limited.

The NP Group respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you how we look after customer's personal data when it is provided to us. This could be when you set up a credit or cash account with us, sign up to our promotional emails, visit our website or engage with us in any way. It will also detail your privacy rights and how the law protects you.

This Privacy Policy should be read in conjunction with our Website Privacy Policy which can be found at norman-piette.com/privacy-policy.

The bullet points here detail the content of this Privacy Policy.

- 1. Purpose and Important information**
- 2. The data we collect about you**
- 3. Data protection principles**
- 4. How is your personal data collected**
- 5. How we use your personal data**
- 6. Data security**
- 7. Data retention**
- 8. Your legal rights**
- 9. Monitoring**
- 10. CCTV**
- 11. Associated Documents**

1. Purpose and Important Information

This privacy notice aims to give you information on how The NP Group collects and processes your personal data in our dealings with you, including in providing goods and services to you, and including any data you may provide through our website.

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.

Controller

The NP Group is the controller of your personal data and responsible for our website. The NP Group is part of the NP Group.

The NP Group has appointed a Data Protection Lead (DPL) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPL using the details set out below.

Contact Details

Our full details are:

Full name of legal entity:	The NP Group
Title:	Data Protection Lead
Email address:	dataprotection@np-group.com
Postal address:	The NP Group, Bulwer Avenue, St Sampsons GY1 3EE

You have the right to make a complaint at any time to the Office of the Data Protection Commissioner.
Email: enquiries@odpa.gg

Changes to the Privacy Policy and your duty to inform us of changes

This Privacy Policy was last updated on 06/08/2018.

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 by using the contact details listed above.

Third-party links

Our website may include links to third-party websites, plug-ins and applications.
Clicking on those links or enabling 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.

The NP Group needs to collect personal information about individuals with whom it deals in order to carry out its business and provide its services.

Such individuals include customers, employees (present, past and prospective), suppliers and other business contacts.

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, title.
- **Contact Data** includes billing address, home address, email address and telephone numbers.
- **Financial Data** includes payment card details and, where you or your business have or apply for a credit account with us bank account details and information about your credit references
- **Transaction Data** includes details about you/your business trading history, including payments from you/your business.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website/or any apps.
- **Profile Data** includes your WebTrack username and password, products/services provided to you/your business, feedback and survey responses.
- **Usage Data** includes information as to how you use our website.
- **Marketing and Communications Data** includes your preferences as to whether you are happy to receive marketing from us and, if so, your communication preferences.

The NP Group may occasionally be required to collect and use certain types of such personal information to meet regulatory and legal requirements.

No matter how it is collected, recorded and used (e.g. on computer or other digital media, hardcopy, paper or images, including CCTV) this personal information is dealt with in accordance with the relevant law, The Data Protection (Bailiwick of Guernsey) Law, 2017 and Data Protection (Jersey) Law 2018.

The lawful and proper treatment of personal information by The NP Group is important to the success of our business and in order to maintain the confidence of our customers, employees and suppliers.

In the normal data collection process, we will not collect *Special Category* data about you.

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 contract you have with us but we will notify you if this is the case at the time.

3. Data Protection Principles

The NP Group fully supports and complies with the seven enforceable principles in relation to the processing of personal data, which state:

Personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject (*'lawfulness, fairness and transparency'*)
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (*'purpose limitation'*)
- adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed (*'minimisation'*)
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (*'accuracy'*)
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (*'storage limitation'*)
- processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (*'integrity and confidentiality'*)
- responsible for and must be able to demonstrate, compliance with the aforementioned data protection principles (*'accountability'*).

4. 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, via our website or otherwise. This includes personal data you provide when you or your business:
 - request a quote for products/services;
 - request a brochure to be sent to you/your business;
 - apply for, or operate, a credit account with us;
 - apply for, or operate, a cash card with us;
 - purchase goods and/or services from us;
 - enter a competition, or respond to a promotion or survey; or
 - provide feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our website privacy policy for further details.
- Other businesses in the same or related sectors. As part of our credit referencing procedures we may make enquiries of other businesses in the same or related sectors as to your/your business' trading history with them, and may share information as to your/your business' trading history with us. This will only be carried out with your signed consent.
- Identity and Contact Data from publicly available sources such as the Guernsey Registry.

5. 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.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email.

You have the right to withdraw consent at any time by clicking 'Unsubscribe' on a promotional email or by emailing info@norman-piette.com

Purposes for which we will use your personal data

We have set out below, in a table format, a description of 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 on more than one lawful basis depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to an enquiry from you.	(a) Identity (b) Contact	Necessary to take steps at your request prior to entering into a contract with you.
To undertake credit-referencing checks in connection with applications for and the operation of a credit account with us.	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary to take steps at your request prior to entering into a contract with you. Necessary for our legitimate interests in protecting our business from insolvent customers and fraud. Necessary for means of substantial public interest (preventing fraud).
To provide goods and/or services to you, and to collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you Necessary for our legitimate interests (to operate our business and recover debts due to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you for feedback	(a) Identity (b) Contact (c) Profile (d) Marketing and Communication (e) Usage	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our services) Your consent (email/SMS marketing)

When we refer to legitimate interests, we mean the interest of our business in conducting and managing our business to enable us to give you the best service/product. 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).

We do not undertake automated decision-making using your personal data.

Marketing/promotional emails

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

Where you have agreed to receive it, we may use your Identity, Contact and Usage 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 goods, services and offers may be relevant for you.

We will only share your personal data for marketing purposes in accordance with your preferences/consent.

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

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 our website may become inaccessible or not function properly. For more information about the cookies we use, please see our website policy www.norman-piette.com/privacy-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 email dataprotection@np-group.com

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.

6. Data Security

The NP Group 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. Processors we appoint 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 the regulator of a breach where we are legally required to do so.

7. Data Retention

How long will we hold your personal data for?

The NP Group 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 types of your personal data are available in our retention policy which you can request from us by emailing dataprotection@np-group.com

Or

We keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances, you can ask us to delete your data: see *Request erasure* below for further information.

8. Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a "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. The NP Group will respond to all such subject access requests as quickly as possible but will ensure it is provided within the period set out in The Data Protection (Bailiwick of Guernsey) Law, 2017 and Data Protection (Jersey) Law 2018.
 - Individuals will not be entitled to access information to which exemptions in the Law apply. Only those specific pieces of information will be withheld and a The NP Group Director will make this determination.
 - To download a subject access request form please visit www.norman-piette.com/downloads or pick up one from our Reception.
- **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 our legitimate interest (or that 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 situations: (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.

9. Monitoring

Compliance with the policies and procedures laid down in this document will be monitored by The NP Group's Data Protection Lead, together with independent reviews by External Audit and or other appointed assessors.

The NP Group's Data Protection Lead will monitor, revise and update this document on a 3-yearly basis or sooner if the need arises.

10. CCTV

For the greater security of our customers and staff, and to prevent and detect crime, we use CCTV in and around our premises. For more information about our use of CCTV please read our CCTV policy which can be found on our website at www.norman-piette.com/downloads

11. Associated Documents

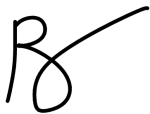
The following documents will provide additional information:

- The Data Protection (Bailiwick of Guernsey) Law, 2017
- Regulation (EU) 2016/679 of the European Parliament (GDPR)
- Data Protection (Jersey) Law 2018

Version Control

Version Number	Date	Author	Status	Notes
1.0	March 2019	Data Protection Lead	Current	

Signed by CEO



Issue Date: March 2019
Next Review Date: May 2020

Version Number: 1.0
Page: 7 of 7