

# BREASLEY

## PRIVACY POLICY

### Key Details

- Policy Prepared By: Breasley(UK)Ltd. (referred to as Breasley)
- Policy Became Operational On: 28 May 2020

### What is this Policy?

This Privacy Policy provides up to date information about how we collect, hold, process and dispose of your personal data. It also explains your rights under the law relating to your personal data.

In this Privacy Policy “we” or “us” refers to Breasley (UK) Ltd.

We are known as the “data controller” of personal information we process. We require information about you to provide our products and collect payments.

For the General Data Protection Regulations 2018, the data controller is:

Breasley (UK) Ltd.

Company number 12579460.

Registered address: 4 Claridge Court, Lower Kings Road, Berkhamsted, Hertfordshire, England, HP4 2AF

### What is Personal Data?

It is defined as, “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”. In other words, any information about you that enables you to be identified. This can include obvious information such as name or contact details, but it also includes identification numbers, electronic location data and other online identifiers.

### What are Your Rights?

If you are a resident of the European Economic Area (EEA), and in certain circumstances, you have the following data protection rights:

**The right to access, update or to delete the information we have on you.**

**The right of rectification.** You have the right to have your information rectified if it is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where Breasley Pillows Ltd. relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

If you require any further information on our use of your personal data or your rights outlined above, please email [data@breasley.co.uk](mailto:data@breasley.co.uk). This address should also be used if you wish to notify us of data which is inaccurate.

## **What Personal Data do you Hold?**

When you contact us by phone, email, post, social media, in person, using the "Contact Us" section of any of our websites ([www.breasley.co.uk](http://www.breasley.co.uk), [www.salusbeds.co.uk](http://www.salusbeds.co.uk), [www.unomattress.co.uk](http://www.unomattress.co.uk)) or completing one of our reception kiosks we may collect some or all of the following personal data about you:

- Name
- Gender
- Address
- Email Address
- Company Name and Job Title
- Phone Number (inc mobile)
- Billing Address and Payment Details
- Delivery Address
- Car Registration
- Order History

## **How do we Collect Personal Data?**

We obtain personal information directly from you. For example, a "Contact Us" form, an email or a purchase order form.

We may obtain some information through the use of CCTV, which is used on our premises to ensure the safety and security of our staff, customers and suppliers.

We may obtain some information from 3rd parties we work closely with. For example, business partners, suppliers and credit agencies. We do not control or supervise how the 3rd parties providing information process your personal data, and any information request regarding the disclosure of your personal information should be directed to those parties.

## **How do we use your Personal Data?**

If you are from the European Economic Area (EEA), Our legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

We may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- To comply with the law

Your personal data will be used for the following purposes:

- Entering a contractual arrangement to supply goods / services to you
- Entering a contractual arrangement to purchase goods / services from you
- Communications required to fulfill contractual obligations
  - To collect or send payments as per contractual obligations
- To respond to a complaint
  - Legal requirements relating to data protection
  - Legal requirements relating to health and safety
  - Anti-money laundering and fraud investigations
- Assisting law enforcement
- Any other legal obligations placed on us

With your permission we may use your personal data for marketing purposes, which could include contacting you by email or post with news, information and offers.

## **How do we Store and Share your Data?**

We use strict procedures and security features to prevent unauthorized access to your personal information. We will only store or transfer your personal data in the UK and fully protected under the GDPR.

On few occasions we may be required to share your data with our business partners. These include third party IT providers, payment processing companies and delivery companies.

## **How Long do we Keep Your Data?**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

## **How Can you Access Your Personal Data?**

You can ask for a copy of your personal data (if held). This is known as a "subject access request". Please email [data@breasley.co.uk](mailto:data@breasley.co.uk) with your request.

A Subject Access Request is usually free unless your request is, 'manifestly unfounded or excessive'. In which case an administration fee may be charged.

We will respond to all requests within 30 days.

## **Disclosure of Data**

Disclosure for Law Enforcement Under certain circumstances, Breasley (UK) Ltd. may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## **Legal Requirements**

Breasley (UK) Ltd. may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Breasley Pillows Ltd.
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## **Security of Data**

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## **Your Data Protection Rights Under General Data Protection Regulation (GDPR) Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [itservices@breasley.co.uk](mailto:itservices@breasley.co.uk)