

## **Privacy Notice**

This privacy notice describes how we collect and use personal data about you in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act (DPA) and any other laws, regulations or legislation as amended or updated as part of Data Protection Legislation.

As a company, Craster is involved in the design and production of luxury product ranges and associated activities. We are a registered as a limited company under number 04503732 and our registered office is at Suite 218, Great Western Studios, 65 Alfred Road, London, W2 5EU.

Craster is the controller and processor of data for the purposes of GDPR and DPA. This means we are responsible for deciding how we hold and use personal data about you.

### **Your Data**

We obtain personal data about you for example when:

- You request a proposal from us in respect of the products, services and deliveries we provide
- Either you or your employer or our clients engage us to provide products
- You contact us via email, telephone, post, our website contact form or social media
- Through attendance at trade shows
- From third parties and or publicly available resources

The information we hold about you may include the following:

- Your personal details such as your name, address, phone number, mobile phone number
- Any previous details of contact we have had in relation to the provision or proposed provision of our products, advice or guidance
- Details of any products you have received from Craster
- Our correspondence and communications
- Information about any complaints or enquiries
- Information from research, surveys and marketing activities
- Information we receive from other sources such as publicly available information, information provided by your employer, our clients, our suppliers or information from our associated network.

We may process your personal data for the performance of our contract with you or our clients.

The nature of our legitimate interests is to protect our employees, our customers and our business. We will never process your data where these interests are overridden by your own interests. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data you have the right to withdraw your consent to processing for that specific purpose.

We may use your personal data in order to:

- Carry out our obligations arising from any agreements entered into between you, your employer or our clients and us, which will usually be for our provision of our products, services and deliveries

- Carry out our obligations arising from any agreements entered into between our clients and us, which will most usually be for the provision of our products, services and deliveries, where you may be a client, an employee of our client, subcontractor, supplier or customer.
- Provide you with information related to our products, services and deliveries and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes
- Seek your thoughts and opinions on the products, services and deliveries we provide
- Notify you about any changes to our products, services and deliveries.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you or our client. Alternatively, we may be unable to comply with our legal or regulatory obligations and we will tell you about the implications of that decision if applicable.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are required to do so by law.

### **Data Retention**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- The requirements of our business and the products, services and deliveries provided
- Any statutory or legal obligations
- The purposes for which we originally collected the personal data
- The lawful grounds on which we base our processing
- The types of personal data we have collected
- The amount and categories of your personal data
- Whether the purpose of the processing could reasonably be fulfilled by other means.

Where or when we need to use your personal data for a different purpose to the one for which it was collected, we will only use your personal data where that reason is compatible with the original purpose; but should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis before starting any new processing.

We will share only your personal data with third parties where we are required by law or where it is necessary to administer the relationship or contract between us or where we have another legitimate interest in doing so.

### **Third Parties**

“Third parties” includes third-party service providers or other entities within our company. The following activities are carried out by third-party service providers:

- Information Technology (IT) and cloud services, professional or advisory services, administration services, marketing services, payment services, warehouse suppliers and Tax administration which is a legal obligation.

- All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

We may need to share your personal data with a regulator or to comply with the law.

We will not transfer any personal data we collect about you outside of the EEA without gaining your consent.

### **Security of your Data**

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, altered or disclosed, used or accessed in an unauthorised way. 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality and similar standards of compliance.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

It is important that the personal data we hold about you is accurate and up to date. Should your personal information change, please notify us of any changes by contacting us using the contact details below.

### **Your Rights**

Under certain circumstances you have the right to:

- Request access to your personal data
- Request correction of the personal data that we hold about you
- Request erasure of your personal data
- Restrict the processing of your personal data
- Object to the processing of your personal data
- Request the transfer of your personal data to you or another data controller

If you want to exercise any of the above rights, please email [gdpr@craster.com](mailto:gdpr@craster.com)

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This is another appropriate security measure to ensure that your personal information is not disclosed to any person who does not have the right to receive it.

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 (for example in relation to marketing that you would like to receive from us), **you have the right to withdraw your consent at any time. To withdraw your consent simply email [gdpr@craster.com](mailto:gdpr@craster.com)**

If you chose to opt out we will refrain from sending you any further marketing material, though we may keep a record of your information as part of our legal obligation or where it is necessary for the purposes of our legitimate interests and those interests are not overridden by your privacy rights.

This privacy notice was last updated on 24th May 2018.

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email [gdpr@craster.com](mailto:gdpr@craster.com)

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data. The ICO's contact details are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>