

## **Introduction**

Data Protection legislation (which includes the UK General Data Protection Regulation ('GDPR') and the Data Protection Act 2018 ('DPA')) places obligations on Genuit Group plc and its subsidiaries ('Genuit' or the 'Group') in respect of the way that we handle your personal information. We respect your privacy and are committed to protecting your personal data. You are entitled to know how we intend to use your information. All our employees are responsible for maintaining customer confidentiality, and we provide training to all employees to remind them of their obligations. In addition, our policies and procedures are regularly audited and reviewed.

This privacy policy sets out how we look after your personal data when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

## **Important information and who we are**

### **Purpose of this privacy policy**

This privacy policy aims to give you information on how Genuit collects and processes your personal data through your use of this website and any data you may provide through our other websites.

It is important that you read this privacy policy together with any other privacy policy or fair processing 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 policy supplements other notices and privacy policies and is not intended to override them.

### **Contact details**

If you have any questions about this privacy policy or our privacy practices, including any requests to exercise your legal rights, please contact our Company Secretary in the following ways:

Full name of legal entity: Polypipe Limited

Email address: [company.secretary@genuitgroup.com](mailto:company.secretary@genuitgroup.com)

Postal address: 4 Victoria Place, Holbeck, Leeds, LS11 5AE

Telephone number: 01138 315 315

### **Controller**

The Genuit Group is made up of different legal entities, details of which can be found in the 'Our Businesses' section of our website. This privacy policy is issued on behalf of the Genuit Group, so when we mention "Genuit", "we", "us" or "our" in this privacy policy, we are referring to the relevant company within the Genuit Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us, and each of our Business' websites will contain this information in their Privacy Policy section. Polypipe Limited is the controller and is responsible for this website.

## **Your rights**

Under the GDPR and DPA you have a number of rights with regard to your personal data. For example you can ask for a copy of your personal data through a Subject Access Request, you can ask for your information to be corrected if it is inaccurate, you can ask for the processing of your data to be restricted whilst we may be resolving an issue, you can ask for your data to be deleted, and you have the right to data portability. Further detail on your rights is outlined in the 'Your legal rights' section below.

## **Exercising these rights**

If you wish to exercise your rights, please contact the Company Secretary on the details outlined above.

You may also make the request to any Genuit Group employee who will start the process for you. If the request is made verbally, the Genuit Group employee receiving the request shall record it in writing and confirm the next steps to you.

If we decide not to act on your request within a month, or refuse the request, we will set out clearly the reason we took no action.

## **Right to complain**

We hope that we provide you with the service you expect in relation to how we manage your personal data. Please contact us if there is anything you are concerned about and we will endeavour to address this. If you are still not satisfied, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## **Changes to the privacy policy and your duty to inform us of changes**

We are continually improving our methods of communication and adding new functionality and features to this website and to our existing services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data practices will change from time to time. We encourage you to check this page frequently because, by visiting our website, you agree to and accept the current version of this privacy policy. 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.

## **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those 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 policy of every website you visit.

## **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). In general, you can use this website without giving us any information. However, additional services may be available if we have certain information about you. We only collect the data we need to provide you with the service you require.

Therefore, across the Genuit Group, 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, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you through the use of our websites (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. The only exception to this may be if you apply for a role within the Genuit Group, but should this be the case, you will be informed of the Special Categories of Personal Data required at the time and will have the opportunity to give consent.

### **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 an order or service you have with us, but we will notify you if this is the case at the time.

## **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 or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on one of our apps or websites;
  - subscribe to our services or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookies Policy for this website for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties or public sources, some examples of which are set out below:
  - Technical Data from the following parties:
    - (a) analytics providers;
    - (b) advertising networks; and
    - (c) search information providers.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Identity and Contact Data from data brokers or aggregators.
  - Identity and Contact Data from publicly available sources.

## **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 obligation.

## **Privacy Policy**

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before collecting any Special Category of Personal Data from you during any recruitment process, or before sending third party direct marketing communications to you via email or text message. Where we ask for your explicit consent to provide us with your data, you are free to refuse and withdraw your consent at any time by contacting us. If you refuse or withdraw your consent, we will require your email address only to ensure we stop any automated marketing communications. This shall not affect the lawfulness of any processing that was based on your consent before you withdrew it.

If you do not agree to provide your Personal Data to us we may not be able to provide you with the transaction or service you require.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all 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 for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest <sup>1</sup>
To register you as a new customer	(a) Identity (b) Contact (c) Marketing and Communications	Performance of a contract <sup>2</sup> with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to 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 to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation <sup>3</sup> (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>For prospective employees: to assess your suitability for a role within the Genuit Group</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>Necessary for our legitimate interests to review and determine your potential employment and subsequent performance of a contract with you.</p>
<p>For visitors: to maintain the security of our sites, which may include your name, company, and car registration, or photograph.</p>	<p>(a) Identity (b) Contact</p>	<p>Necessary for our legitimate interests to ensure the security of our sites. Information will be deleted in accordance with our data retention and destruction policy and will not be shared with any third parties, nor will it be used for any other purposes.</p>
<p>To deter and support the investigation of crime against our business we use CCTV. We may also use it to support investigations into accidents and potential safety issues.</p>	<p>(a) Identity</p>	<p>(a) Necessary for our legitimate interests (b) Performance of a contract with you</p>

## **Privacy Policy**

1. **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
2. **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
3. **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We use customer relationship management tools to keep records up-to-date and cleanse our databases regularly, and audit annually. We use an email platform to capture and track opt-ins and opt-outs. Furthermore, we have established the following personal data control mechanisms:

### ***Promotional offers from us***

We may use your Identity, Contact, Technical, Usage and Profile 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 products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

### ***Third-party marketing***

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### ***Opting out***

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### ***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 this website may become inaccessible or not function properly. For more information about the cookies we use on this website, please see our Cookies Policy. Our Business websites contain the same Cookie Policy, but inclusive of the specific cookies they collect.



***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 contact us.

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.

**Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above.

1. Any legal entity within the Genuit Group.
2. External Third Parties, with your specific consent, as part of a performance of a contract with you (such as delivery of goods or services) or those necessary to comply with a legal obligation, for example:
  - 2.1 Service providers who provide IT and system administration services.
  - 2.2 Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
  - 2.3 HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
3. Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**International transfers**

We share your personal data within the Genuit Group. This may sometimes involve transferring your data outside the UK.

We ensure your personal data is protected by requiring all of our Genuit Group companies to follow the same rules when processing your personal data.

## Privacy Policy

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring compliance with either the UK IDTA or the SCCs, as applicable. Our overseas subsidiaries are required to comply with our Genuit Group data protection policies at all times. As the majority of our operations are UK based, there is limited personal data transferred overseas.

Please contact us if you want further information on the specific mechanism used by us if transferring your personal data out of the UK.

### **Data security**

We 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. They 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 any applicable regulator of a breach where we are legally required to do so.

### **Data retention**

*How long will you use my personal data for?*

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our Retention and Destruction Policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data. Please see below for further information. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

**Right of access** – subject to certain exceptions, you have the right of access to your personal data that we hold.

**Right to rectify your personal information** – if you identify that the personal data we hold about you is inaccurate or incomplete, you have the right to have this rectified (i.e. corrected).

**Right to withdraw consent** – you may ask us to delete any personal data we hold about you in certain circumstances. This right is not absolute and it may not be possible for us to delete your personal data, for example, if we have an ongoing contractual relationship or are required to retain information to comply with our legal obligations.

**Right to restriction of processing i.e. for marketing purposes or automated profiling** – in some cases you may have the right to have the processing of your personal data restricted. For example, where you contest the accuracy of your personal data, its use may be restricted until the accuracy is verified.

**Right to object to processing** – you may object to the processing of your personal data (including profiling) when it is based upon our legitimate interests. You may also object to the processing of your personal data for the purposes of direct marketing and for the purposes of analysis.

**Right to data portability** – you have the right to receive, move, copy or transfer your personal data in a structured, commonly used and machine-readable format to another controller when we are processing your personal data based on consent or on a contract and the processing is carried out by automated means.

**Right to be notified of a breach** – we have the obligation and you have the right to be notified of a personal data breach which is likely to result in high risk to your rights and freedoms.

**Right to make a complaint** – you can make a complaint to the supervisory authority – in the UK, this is the Information Commissioner's Office.

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.