



Website privacy notice

This privacy notice provides you with details of how we collect and process your personal data through your use of our site www.ldseating.co.uk.

I. Controller of Personal Data (Controller)

The Controller of the personal data shall be LD Seating Ltd, 2 Osborne Place, DD2 1BD, Dundee. Should you need to address us regarding personal data processing issues, you can do so via e-mail: accounts@ldseating.co.uk, or via regular mail at 2 Osborne Place, DD2 1BD, Dundee.

LD Seating Ltd shall process the personal data according to the rules set by the law of the European Union, in particular according to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at accounts@ldseating.co.uk.

II. Extent of Personal Data Processing

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and

ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

- Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
- Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.
- We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that 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. We do not collect any information about criminal convictions and offences.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at accounts@ldseating.co.uk. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

III. Source of the Personal Data

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Cookies

When you visit our website, we automatically collect the non-personal data provided in the browser cookies. Cookies are small text files that the website places into the web browser cookie. When you return to our site, the browser sends cookies back to the server and it gets all the information saved by your browser, such as a password or login name. Cookies are used by the vast majority of websites nowadays.

You can block restrict or delete cookies directly in your browser at any time. If you don't know how to do so, please use the help provided by your browser.

IV. Which Personal Data Do We Process

For user zone login purposes, the Controller collects the following information:

1. First Name and Surname - mandatory, for the purpose of identifying a contact person
2. Email Address - mandatory, unique identifier for login to customer zone, newsletter sending address, as well as a communication address
3. Country - mandatory, for the purpose of displaying territorially set information and price lists
4. Password - mandatory for customer zone login purposes
5. Phone number - optional
6. Company name - optional
7. Position within the company - optional

The provision of mandatory data is voluntary, but necessary for registration to access the client zone web portal. The customer who has a created account on our web portal may, at any time request its removal to accounts@ldseating.co.uk. Cancelling an account is irreversible and means deleting all data and communication history. Restoring the cancelled account will not be possible.

In case of registration for the purposes of newsletter, we process

1. e-mail address
2. IP address

Any newsletter provided by an external company sends such business communication based on your subscription login. You can terminate the subscription by using the "Unsubscribe" link that is part of each newsletter sent.

In case of via e-mail communication, we process these data:

1. name or nickname
2. e-mail address
3. other personal data you voluntarily fill in the text of your message.

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes we will get your express consent.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at accounts@ldseating.co.uk at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

V. Ways of Personal Data Processing and Protection

The Controller declares that the personal data is processed only for the stated purpose. Your personal data is technically and procedurally secured in the way that there cannot be an unauthorized or random access, change, deletion or loss, unauthorized transmissions as well as other misuse. All data provided by the customer at the registration are stored in encoded form based on the actual safety standards.

VI. Categories of Personal Data Processors and Recipients

We may have to share your personal data with the parties set out below:

- Other companies in our group who provide services to us. LD Seating S.r.o.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Jigsaw Media, 61 Dock St, Dundee, DD1 3DU.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

VII. How Long Do We Keep Your Personal Data

The personal data needed for access to the user zone portal, we keep for the duration of the registration and for the technically needed period to delete the data upon your request for deletion of registration. The database is backed up every 7 days by default and then automatically overwritten by the current backup.

E-mail communication is normally saved for a maximum of 3 years since the last communication, unless a contract is concluded.

VIII. The Rights of the Data Subject

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [INSERT EMAIL ADDRESS].

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 or refuse to comply with your request in these circumstances.

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 to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.