

Privacy Policy

Introduction

This privacy policy is for our contacts: our clients and those we provide services to (including anyone receiving our updates or invites); our suppliers; and anyone visiting our website.

If you are an individual whose social media data we process in order to provide services to our clients, please see our Privacy Policy for Contributors.

We respect your privacy and are committed to protecting your personal data. This privacy policy will let you know how we look after your personal data when we interact with you or provide services to you and when you visit our website (regardless of where you visit it from) and tell 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 we, Material, collect and process your personal data through our interactions with you, including when we order services or supplies from you, when we provide our services to you or when you use our website, including any data you may provide through our website when you make an enquiry.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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.

Controller

Material UK (Scotland) Limited is the controller and responsible for your personal data (collectively referred to as “Material”, “we”, “us” or “our” in this privacy policy).

We are responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Full name of legal entity: Material UK (Scotland) Limited

Email address: dataenquiry@wearematerial.co.uk

Postal address: 3rd Floor, 20 South Frederick Street, Glasgow, Scotland, G1 1HJ

Telephone number: 0141 204 7970

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



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

We keep our privacy policy under regular review and the most current version can be found on our website or requested from us on the contact details above.

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

Our 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) nor does it include information about organisations or corporate bodies.

Generally we will process information about your company or organisation rather than about you as an individual but where we do use your personal information, we will do so in accordance with this privacy policy.

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, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **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.
- **Usage Data** includes information about how you use our website, products and services on your own behalf or on behalf of your company or organisation and includes information about your service preferences and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- We 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.

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- We do not usually collect any **Special Categories of Personal Data** about you (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 generally collect any information about criminal convictions and offences. In order to facilitate our contact with you we may process your health data where you have made this public (for example, to enable your access to our premises if you have mobility requirements).

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 product 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, e-mail or otherwise. This includes personal data you provide when you:
 - contact us about for our services;
 - contact us on our website;
 - purchase or order our services;
 - create an account with us or otherwise subscribe to our service or publications;
 - request marketing or other communications to be sent to you;
 - provide us with an invoice or contact details; 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 [server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. For further information please see our Cookie Policy.
- **Third parties or publicly available sources** - We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU; and
 - (b) Social media platform analytics such as Twitter, Instagram and LinkedIn
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

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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 (this is only relevant where our contract is with you as an individual, not when our contract is with your company or organisation).
- 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**.

To find out more about the types of lawful basis that we will rely on to process your personal data see the section titled 'Lawful Basis' in the enclosed glossary.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via e-mail or text message. You have the right to withdraw consent to marketing at any time by contacting us.

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.

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Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register your company or organisation as a new customer and you as our contact.	(a) Identity (b) Contact	Our legitimate interests in providing services to our clients and running our business (including maintaining our records).
To provide services to your company or organisation including: (a) managing payments, fees and charges; and (b) collecting and recovering money owed to us.	(a) Identity (b) Contact (c) Financial (d) Usage	Our legitimate interests in running our business (including providing our services, maintaining our records and recovering costs and debts owed to us).
To acquire products or services from your company or organisation including: (a) managing payments, fees and charges; and (b) obtaining products or services we have purchased or ordered from you.	(a) Identity (b) Contact (c) Financial (d) Usage	Our legitimate interests in running our business (including ordering products or services, maintaining our records and paying invoices).
To manage our relationship with your company or organisation and with you as our contact which will include: (a) notifying you about changes to our terms or privacy policy; (b) communicating with you about our services; (c) communicating with you about services/products we seek to acquire or have acquired from you; and (d) asking you to leave a review or take a survey.	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	(a) Necessary to comply with a legal obligation; and (c) Our legitimate interests in running our business and providing services to our clients (including maintaining our records, maintaining communications with our clients and to study how customers use our services).
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) Our legitimate interests in 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); and (b) necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Our legitimate interests in studying how customers use our products/services and website; to develop our products/services and website; to grow our business; and to inform our marketing strategy.

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Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Our legitimate interests in running our business (including 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).
To make suggestions and recommendations to you about goods or services that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Our legitimate interests in developing our products/services and growing our business.

Marketing

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

Promotional offers from us

We may use your organisation's Identity, Contact, Technical and Usage Data to form a view on what we think your organisation may want or need, or what may be of interest. If you are an individual who has been in contact with us for your own purposes, we may also use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need or be interested in. This is how we decide which products, services and offers may be relevant for your organisation or for you (we call this marketing).

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

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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 please see our Cookies Policy, or contact us via dataenquiry@wearematerial.co.uk.

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 have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above.

- Service providers acting as processors based in the UK who provide IT and system administration services, including Certum, our third party web services providers Namesco Limited (US), 123 Reg (US) and Wordpress (US) and our CRM system provider Hubspot Inc (Dublin, European HQ).
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.
- 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 notice.
- Contact Data from providers of technical and delivery services such as: Mailchimp (Atlanta, US) and Hubspot Inc (Dublin, European HQ).

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International transfers

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
- We enter into agreements with our service providers which provide for the protection of your data on the same level as provided under this privacy policy.

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

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 of 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.

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By law we have to keep basic information about our customers and suppliers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see 'Your Legal Rights' 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 data protection laws you have rights in relation to your personal data that include:

- **Request access to your personal data** – Commonly known as a “data 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.
- **Request correction of your personal data** - 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 a legitimate interest (or those 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 your personal data** - This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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- **Request transfer of your personal data** - 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.
- **Right to 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.

If you wish to exercise any of the rights set out above, please contact us on dataenquiry@wearematerial.co.uk.

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 to speed up our response.

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.