



PRIVACY POLICY

Overview

Recliners is committed to respecting your privacy rights. This privacy policy, which applies whether you visit our website, contact us by telephone or email, provides you with information about:

- what personal data we collect;
- how we use that personal data;
- disclosures of your personal data to third parties; and
- the legal bases on which we rely on to process your personal data.

You do not need to take any action as a result of this privacy policy, but you do have certain legal rights as described below.

It is important that you read this privacy policy together with any other privacy notice 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 notice supplements the other notices and is not intended to override them.

This website is not intended for children and we do not knowingly collect or solicit data relating to children.

1 Important information and who we are

Who we are

Recliners Limited is the “data controller” of your personal data (referred to as “we”, “us”, “our” or “**Recliners**”). In simple terms, this means that we: (i) “control” your personal data, including making sure that it is kept secure; and (ii) make certain decisions on how to use and protect your personal data, but only to the extent that we have informed you about the use or are otherwise permitted by law.

How to contact us or make complaints

If you have any questions regarding our use of your personal data (including any requests to exercise your legal rights), or this privacy policy, please contact matt@recliners.org.uk.

Our full contact details are:

Recliners Limited
Old Griffin Field, Windsor Street, Pentre. Mid Glamorgan CF41 7JJ

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 always appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to this privacy policy and your personal data

This privacy policy is regularly reviewed and was last updated on 12/06/2018

It is important that the personal data we hold about you is accurate and up-to-date. Please keep us informed if your personal data changes during your relationship with us.



Third party sites and 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 processing of your personal data. When you leave our website, we encourage you to read the privacy notice of every website you visit

2 The personal data we collect about you

The types of personal data we collect, use and store about you will depend on the product or service you have with us. We collect the following personal data:

- your name, age/date of birth and gender;
- your contact details: postal address including billing and delivery addresses, telephone numbers (including mobile numbers) and e-mail address;
- purchases and orders made by you;
- your on-line browsing activities on our website;
- your password(s);
- when you make a purchase or place an order with us (whether online or offline), your payment card details;
- your communication and marketing preferences;
- your interests, preferences, feedback and survey responses;
- your location;
- your correspondence and communications with Recliners; and
- other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed or public Facebook page).

The Recliners's website is not intended for children and we do not knowingly collect or solicit personal data from anyone under the age of 16.

We do not collect any special category 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 collect any information about criminal convictions and offences.

3 How we obtain your personal data

Information you provide to us

We collect information about you directly when you provide it to us in correspondence and conversations (including via email and telephone) and through forms and contracts we may enter with you.

Information we get from other sources

We collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources.



In connection with an employment enquiry, we also collect data regarding your work authorisation status, education history, employment history and professional designations, and other information about your qualifications from third parties.

We may combine personal data that you provide to us with information that we collect from, or about you, in some circumstances. This will include information collected in an online or offline context

4 How we use your personal data

We will only collect and process your personal data where we have lawful basis to do so.

We use your personal data for the following purposes, and pursuant to the corresponding legal basis:

| Purpose | Legal Basis |
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| To register you as a new customer. | Performance of a contract with you. |
| To process and deliver your order including: (a) managing payments, fees and charges; and (b) collecting and recovering money owed to us. | (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 charges to our terms or this privacy policy; and (b) asking you to leave a review or take a survey. | (a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to study how customers use and rate our products and services, to develop them and our business). |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. | 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). |
| Improve our website and the products and services that we offer and notify you about changes to our services. | 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). |
| To verify your identity and to identify and prevent fraudulent transactions. | Necessary for our legitimate interests |



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| To enable Recliners to manage customer service interactions with you. | Necessary for our legitimate interests (to understand how our customers use our products and services and improve our business). |
| Where we have a legal right or duty to use or disclose your personal data (for example in relation to an investigation by a public authority or in a legal dispute). | To comply with a legal or regulatory obligation. |

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

No automated decision-making, including profiling, is carried out when processing your personal data.

Marketing

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

You will receive marketing communications from us if you have requested information from us or purchased products or services from us, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have expressly consented to receiving that marketing.

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

You can ask us or third parties to stop sending you marketing messages at any time by contacting matt@recliners.org.uk or by following the unsubscribe link on the message

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 or service purchase, warranty registration, product or service experience or other transactions (which we will continue to process in order to perform a contract with you or as a result of our regulatory or legal obligations)

5 Who we share your personal data with

We will share your personal data with third parties as required by law or regulation.

We will also share your personal information with the parties set out below for the purposes set out in this privacy policy:

6 How we keep your personal data secure

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 also train and instruct our employees that all personal data must be handled in accordance with this privacy policy and applicable privacy and data protection laws, and any misuse by employees is subject to disciplinary action.



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.

7 How long we retain your personal data for

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

For further information on how long we retain your personal data for, please contact matt@recliners.org.uk.

8 Your legal rights

You have the right to access the personal data we hold about you, and there are a number of ways you can control the way in which and what information we store and process about you.

We have explained these individual rights and controls below. To exercise these rights and controls, please contact us at.

- **Access:** You have the right to ask for a copy of the personal data that Recliners holds about you free of charge, however we may charge a ‘reasonable fee’ if we think that your request is excessive, to help us cover the costs of locating the information you have requested. We will respond to your request as soon as possible and (save for in certain circumstances) within one month.
- **Correction:** If there are any inaccuracies in the information we hold about you, please contact us and we will correct them.
- **Deletion:** If you think that we shouldn’t be holding or processing your personal data any more, you may request that we delete it. Please note that this may not always be possible due to legal obligations.
- **Restrictions on use:** You may request that we stop processing your personal data (other than storing it), if: (i) you contest the accuracy of it (unless the accuracy is verified); (ii) you believe the processing is against the law; (iii) you believe that we no longer need your personal data for the purposes for which it was collected, but you still need your data to establish or defend a legal claim; or (iv) you object to the processing and we are verifying whether our legitimate grounds to process your personal data, override your own rights.
- **Object:** You have the right to 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 the transfer:** If you wish to transfer your personal data to another organisation (and certain conditions are satisfied), you may ask us to do so, and we will send it directly if we have the technical means. Please 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.
- **Withdrawal of consent:** If you previously gave us your consent to allow us to process your personal data for a particular purpose, but you no longer wish to consent to us doing so, you can contact us to let us know that you withdraw that consent. 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.

9 Glossary

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| Personal Data | 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'). |
| <i>“Legitimate interest”</i> | 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). |
| <i>“Performance of a contract”</i> | means processing your personal 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. |
| <i>“Comply with a legal or regulatory obligation”</i> | means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to. |