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## PRIVACY POLICY

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This privacy policy is for the following websites; all of which are owned and operated by A&B Glass Company and/or its subsidiaries (Our Sites):

[www.assetfineline.co.uk](http://www.assetfineline.co.uk)

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits these websites, which will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Sites. If you do not accept and agree with this Privacy Policy, you must stop using Our Sites immediately.

### 1. **Information About Us**

Our Sites are owned and operated by A&B Glass Company Limited, a private limited company registered in England under company number 1543721.

The registered and main trading address is Addison Road, Chilton Industrial Estate, Sudbury, Suffolk, CO10 2YW.

### 2. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Sites. Our Sites may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 3. **What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### 4. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 14.
- b) The right to access the personal data we hold about you. Part 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 14 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 14 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 14.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Data Do We Collect?**

Depending upon your use of Our Sites, we may collect some or all of the following personal data:

- Name;
- Postcode;
- Address;
- Email address;
- Telephone number;
- Business name; and
- Information about your preferences and interests.

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. The lawful basis of our use of your personal data is 'legitimate interest' as it is reasonable to expect that you will be contacted about your enquiry having entered your details

into an enquiry form. Your personal data may be used for one of the following purposes:

- Personalising and tailoring our products/services for you.
- Responding to enquiries.
- Communicating with you. This may include responding to emails or calls from you.

Where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, mail or telephone with information, news, and offers on our products/services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

#### **7. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for 24 months from the date of last communication with you.

#### **8. How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

#### **9. Do You Share My Personal Data?**

We may share your personal data with other companies in the A&B Glass Group.

We may share your personal data with third parties, but only as a result of your explicit requests; usually on our enquiry form on the website when you have chosen to be contacted by the third party relating to your enquiry.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

#### **10. How Can I Control My Personal Data?**

In addition to your rights under the GDPR, set out in Part 4, when you submit personal data via Our Sites, we aim to give you strong controls on our use of your data for direct marketing purposes including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails.

#### **11. Can I Withhold Information?**

You may access certain areas of Our Sites without providing any personal data at all. However, to use all features and functions available on Our Sites you may be required to submit or allow for the collection of certain data.

## 12. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 14.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 13. **How Do You Use Cookies?**

Our Sites use website analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Sites are used. This, in turn, enables us to improve Our Sites and the products/services offered through them.

The analytics services used by Our Sites use Cookies to gather the required information. You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Sites more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## 14. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Paul McManus):

Email address: [paul.mcmanus@abglass.co.uk](mailto:paul.mcmanus@abglass.co.uk).

Telephone number: 01787 880099.

Postal Address: Addison Road, Chilton Industrial Estate, Sudbury, Suffolk, CO10 2YW.

15. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Sites following the alterations. We recommend that you check this page regularly to keep up-to-date.

This version of the privacy policy was created on 14<sup>th</sup> December 2021.