

FAIR PROCESSING NOTICE ("PRIVACY POLICY")

1. Who we are

We are Trade UK, a trading name of Screwfix Direct Limited (company number 3006378) whose registered office is at Trade House, Mead Avenue, Yeovil BA22 8RT. You can find out how to contact us in Section 9 below.

2. Your Privacy

In the course of our dealings with you, we will collect and process personal information about you. Personal information includes any information allowing us to identify you as an individual, for example, your name, your email address or your telephone number.

We are committed to protecting your privacy. We will use your personal information in accordance with all applicable laws and regulations that relate to data protection and privacy, including the EU General Data Protection Regulation (GDPR).

This document tells you:

- what personal information we collect;
- why we collect this information;
- how we will use it;
- how long we will keep it;
- who else will see it;
- how you can contact us;
- your rights in relation to the personal information that we hold, including your rights to change, delete and see your information.

When using our website we will also place cookies on your device – please see our Cookies page [here](#) for more information about the cookies we use and how you can change your cookie settings.

3. What information do we collect?

We collect the following types of information:

(a) Information we collect when you register with us

When you register with us, we will ask you for a number of pieces of information including:

- your name;
- your trading name;
- your postal address;
- your email address;
- your telephone number;
- your trade and trade body membership (if any);
- your date of birth (for Trade UK Trade Credit Account applications);
- your bank details (for Trade UK Trade Credit Account applications);
- whether you are a director of a company applying for the Trade UK Trade Credit Account)
- a password – please keep this safe;
- whether you would like to receive information from us via email, SMS text, post or telephone;
- if you are making a payment, we will ask for your payment card number, expiry date and CVV number.

(b) Information we collect about how you use our website and apps

When you shop with us online, browse our websites or other organisations' websites where our adverts are shown, or use our apps, we will collect:

- information about any devices you have used (including the manufacturer, model and operating system, IP address, browser type and mobile device identifiers);
- cookies and information about your online browsing and purchasing behaviour and history on our websites and apps, your location, your product selection, and information about when you click on one of our adverts (including those shown on other organisations' websites);
- details of your purchases with or through us.

4. **Why do we ask for this information?**

- You can browse our website without providing us with any personal information. You do not have to give us permission in order to use our website.
- When you want to access your account online, we ask you to login or register so you can open a customer profile and upload and save images, save your browsing information and your preferences and retrieve them from any of your devices.
- We will ask for or collect your personal information when you use our customer support services, including telephone support.
- We ask for your permission to send you marketing and promotional material using your address, telephone number, email address and SMS, so that we can send you free gifts, discount vouchers, invitations to events, special offers, market research, and other marketing material that we believe may be of interest to you. If you give permission, you will be able to withdraw it at any time by:
 - logging in to your account at www.trade.co.uk and updating your preferences
 - Email: tradeukcustomerservices@credit.trade.co.uk
 - Telephone: 0845 603 8389

5. **How do we use your personal information**

We have set out below the purposes for which we use your personal information. We are also required by law to state a "legal basis for processing", i.e. to tell you on what grounds we are allowed to use your information, and this is also set out below. The legal basis for each purpose is that we have your consent for the use of your personal information, or that we need to use your personal information in order to perform a contract with you, or that the use of your personal information is necessary for our legitimate interests (in which case we will explain what those interests are).

Purpose of processing	Our legal basis
<ul style="list-style-type: none"> • communicate with you about your account; 	Contractual necessity – we use your personal information in order to meet our obligations under our contract with you.
<ul style="list-style-type: none"> • notify you about changes to our services and to otherwise communicate with you. For example, we will use your contact details in order to respond to any queries that you submit to us; 	Legitimate interests – we use your personal information to keep you up to date with information about our services, and to respond to your queries.
<ul style="list-style-type: none"> • send you information about products and services, including free gifts, special offers and discounts; 	Legitimate interests – we use your personal information to send you this information. In some cases (such as where we're required to do so by law) we will also ask for your consent before sending you this information.
<ul style="list-style-type: none"> • review your past purchases and viewing 	Legitimate interests – we use your

<p>history on our website to provide you with special offers or to tailor your experience online;</p>	<p>personal information to provide you with these offers and to tailor your experience when using our online services.</p>
<ul style="list-style-type: none"> • help us review, develop and improve the products and services we offer. For example, calls to our contact centres may be monitored and/or recorded for quality control and training purposes. We may also send you market research requests via email (which you can opt out of via that email). <p>If you raise a query (for example about a product or about our service) while we still hold a recording of your telephone call, and we can investigate or answer your query by referring back to this call, we may do so. This may mean that your call recording will be held until your query has been resolved;</p>	<p>Legitimate interests – we use your personal information to help us deliver the best quality of service to you and our other customers.</p>
<ul style="list-style-type: none"> • where you advise us of trade body membership, as part of our registration process we may verify your membership with that trade body 	<p>Legitimate interests – we may use your personal information to confirm you are a member of the trade body you have stated in your application</p>
<ul style="list-style-type: none"> • improve and measure the effectiveness of our marketing communications, including online advertising. • We sometimes compare limited information that we hold about you (for example, your email address or mobile phone number) with third parties that also hold your information or have an existing online relationship with you in order to identify you as our customer and to enable us (or third parties on our behalf) to provide you with relevant marketing online. For example, we may compare your information with the information that social networking sites such as Twitter, Instagram, and Facebook hold on you, so that they can identify you as a Screwfix customer and hence tailor the Screwfix marketing you receive via their sites and products. • We also share cookie and other data (including online and offline purchase data) with entities such as Google, YouTube, Twitter, Instagram, and Facebook in order to make our advertising more relevant to you. Please see our Cookie Policy for full details of the cookies. We require any such third parties to treat your personal information as fully confidential and to fully comply with all applicable data protection legislation; 	<p>Legitimate interests – we use your personal information to deliver you a tailored experience when using such digital services, to help us understand the effectiveness of our advertising, and to make sure you see adverts that are most relevant to you.</p>

<ul style="list-style-type: none"> • provide, enhance and personalise your experience on our digital services provided from our web and mobile portals; 	<p>Legitimate interests – we use your personal information to deliver you a tailored experience when using our digital services.</p>
<ul style="list-style-type: none"> • carry out security checks to protect against fraudulent transactions and to prevent and detect criminal activity; 	<p>Legitimate interests – we use your personal information to protect against unlawful activities. In some cases we may also be under a legal obligation to disclose your personal information (for example, to law enforcement agencies).</p>
<ul style="list-style-type: none"> • address any claims made against us. 	<p>Legitimate interests – we use your personal information to address any claims you make against us. In some cases we may also be under a legal obligation to disclose your personal information (for example, in connection with legal proceedings).</p>

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

6. **How long do we keep your personal information?**

We are required by law to keep your personal information only for as long as is necessary for the purposes for which we are using it. The period for which we keep your personal information will be determined by a number of criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations.

7. **Who do we share your personal information with?**

We are a member of the Kingfisher Group of companies including B&Q, Screwfix, Castorama and Brico Dépôt (for more information on the Kingfisher Group please visit: www.kingfisher.com).

We share your information with Trade Point (a division of B&Q PLC).

We may share your personal information with other members of the Kingfisher Group in connection with the purposes above and those listed below. Members of the Kingfisher Group may also use the personal information we share with them to improve their websites and other digital services and for analysis purposes.

We may disclose your personal information to third parties, including in the following circumstances:

- We use third parties to carry out certain activities on our behalf that involve the processing of personal information. For example, we may engage third party service providers to send postal mail, SMS text messages and email, maintain and update our databases of customer details (including the removal of repetitive or incorrect information), analyse data to help us develop, provide and improve our services, provide marketing assistance, process payments and refunds, carry out surveys, provide customer service and handle claims. These third parties have access to personal information needed to perform their functions, but may not use it for other purposes. We may use the information we receive from third parties to supplement,

improve and add to our databases of customer details, and for purposes such as credit checking and fraud prevention.

- We may share information that we hold about you (for example, your email address and information about your purchases) with third parties that also hold your information or have an existing online relationship with you in order to identify you and to enable us (or Kingfisher Group companies or other third parties on our behalf) to provide you with relevant marketing online. For instance, we may share your information with social networking sites such as Facebook, Instagram, Twitter, YouTube and Google so that they can identify you as a customer of ours and can tailor the marketing we send you via their sites, applications, and products.
- We may pass your details to third parties (e.g. Experian) for the purpose of improving the quality and accuracy of our database, suppressing records for deceased people and movers, and for appending marketing information.
- We may pass your details to third parties (e.g. Experian) for the purpose of solvency and credit scoring purposes.
- We may pass personal information to external agencies and organisations (including the police and other law enforcement agencies) for the purpose of preventing and detecting fraud (including fraudulent transactions) and criminal activity. These external agencies may check the information we give them against public and private databases and may keep a record of such checks to use in future security checks. We may also disclose personal information to the police and other law enforcement authorities in connection with the prevention and detection of crime.
- We may pass personal information to our insurers in the event that a claim is made or could be made against us.
- In the event that we sell or buy any business or assets, we may disclose personal information held by us to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party (or subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets.
- We may pass your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation (including in connection with a court order), or in order to enforce or apply any agreements we have with or otherwise concerning you (including agreements between you and us (or one or more of our affiliates)) or to protect our rights, property or safety or those of our customers, employees or other third parties.
- We may share anonymous or aggregate data (such as aggregated statistics or other anonymised data) with third parties.

Links to external sites

We may provide links to the websites of other Kingfisher Group companies from our website or mobile applications. Your use of those websites is subject to the terms of use and policies available on those websites.

From time to time we may also establish relationships with third parties that will enable you to access the websites or applications (such as video players) of such third parties directly from our own websites or applications. Each third party operates its own policy regarding the processing of personal information and the use of cookies on its website(s) or through its applications and you are advised to read the third party's privacy policy and cookies policy.

Please note that third party websites and applications are not under our control. When you click through to these websites or access these applications you leave the area controlled by us. We do not accept responsibility or liability for any issues arising in connection with the third party's use of your data (including your personal information).

Where will your personal information be processed?

Your personal information may be transferred to, and stored and processed in, one or more countries outside the European Economic Area (EEA), including countries which do not provide equivalent protection for personal information. In these circumstances, we will take reasonable steps to ensure that your personal information is adequately protected in accordance with the law.

8. Your rights

You have the right to ask us to:

- Confirm what personal information we hold about you and provide you with a copy of that data;
- Correct any personal information that is inaccurate;
- Remove your personal information where there is no good reason for us to continue to hold that data;
- Temporarily stop using your information if you are questioning our right to use that data;
- Stop using your personal information unless we can demonstrate a valid reason why we need to continue to hold that data e.g. to support a product warranty;
- Stop using your personal information to send you marketing materials such as our catalogue, marketing email, discounts or vouchers.
- Provide you with the personal information that you have provided to us, in a structured and commonly-used electronic format, or transmit that information directly to another company if that is technically feasible. This applies where we are using your personal information on the basis of your consent or because it is necessary to perform a contract with you (see *How do we use your personal information*, above).

Our security procedures mean that we may request proof of identity before we are able to disclose your personal information to you or comply with other requests.

We want to make sure that the personal information we hold about you and your preferences as to how we contact you are accurate and up to date. If any of the details are incorrect, please let us know (details below) and we will amend them.

You also have the right to make a complaint to the Information Commissioner's Office if you're not happy with how we've handled your personal information. You can contact the supervisory authority at

- Email: casework@ico.org.uk
- Phone: 0303 123 1113 (local rate) or 01625 545 745
- Post: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF.
- Website: www.ico.org.uk

9. How to contact us?

To update your details or ask for a copy of your personal information:

- Email: tradeukcustomerservices@credit.trade.co.uk
- Telephone: 0845 603 8389
- Online: [here](#)

10. **Protecting your personal information**

The transmission of information via the internet is not completely secure; this risk is common across the internet and not specific to our services. We cannot guarantee the security of your data (including your personal information) transmitted to our services; any transmission is at your own risk.

It is important for you to protect against unauthorised access to your password and to your computing device. Be sure to sign off and close your browser when you have finished your session. This will help to ensure that others do not access your personal information if you share your computing device or use a computing device in a public place such as a library or internet café.

11. **Updates to this notice**

We may update this notice from time to time. The latest version of this notice will be posted on our website.