

Steadfast (Anglia) Privacy Statement and Cookie Policy 30.8.19

Background:

Steadfast (Anglia) Limited understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and Our obligations under the law.

This Statement applies to Our use of any and all data collected by us in relation to your use of Our Site. Please read this Privacy Statement carefully and ensure that you understand it. Your acceptance of Our Privacy Statement is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Statement, you must stop using Our Site immediately.

We keep our privacy Statement under regular review. 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.

1. Definitions and Interpretation

In this Statement the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 12, below;
"Data Protection Legislation"	means all legislation and regulatory requirements in force from time to time relating to the use of personal data and the privacy of electronic communications, including, without limitation (i) any data protection legislation from time to time in force in the UK including the Data Protection Act 2018 or any successor legislation, as well as (ii) the General Data Protection Regulation ((EU) 2016/679) and any other directly applicable European Union regulation relating to data protection and privacy (for so long as and to the extent that the law of the European Union has legal effect in the UK);
“United Kingdom and EU Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015; and

“We/Us/Our”

means **Steadfast (Anglia)** a limited company registered in England under No 04161323, whose registered address is Unit A2 Cradley Business Park, Overend Road, Cradley Heath, West Midlands, B64 7DW and whose main trading address is 4 Columba, Orion Avenue, Ipswich, Suffolk IP6 0LW.

2. Information About Us

- 2.1 Our Site, www.steadfastanglia.co.uk is owned and operated by **Steadfast (Anglia)** a limited company registered in England under No. 04161323 whose registered address is Unit A2 Cradley Business Park, Overend Road, Cradley Heath, West Midlands, B64 7DW. Our VAT number is 642 073 559.

3. Scope – What Does This Statement Cover?

This Privacy Statement applies only to your use of Our Site. It does not extend to any third-party websites, plugins and applications that are linked to from Our Site (whether We provide those links or whether they are shared by other users). 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, plugins or applications and are not responsible for their privacy statements. When you leave our website, We encourage you to read the privacy statement of every website you visit.

4. What Data Do We Collect?

Some data will be collected automatically by Our Site (for further details, please see section 12 on Our use of Cookies), other data will only be collected if you voluntarily submit it and consent to Us using it for the purposes set out in section 5, for example, when signing up for an Account. Depending upon your use of Our Site, We may collect some or all of the following data:

- 4.1 Name, marital status, title, date of birth or gender;
- 4.2 business/company name;
- 4.3 billing address or delivery address;
- 4.4 contact information such as email addresses and telephone numbers;
- 4.5 bank account, payment or transaction details;
- 4.6 IP address (automatically collected);
- 4.7 web browser type and version (automatically collected);
- 4.8 operating system (automatically collected);
- 4.9 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);
- 4.10 industry you operate

This list is not exhaustive.

Depending on the nature of our interactions with you, there may be certain essential personal information that We have to collect from you so that We can provide you with the information, goods or services that you have requested. This will vary depending on the relationship We have with you.

5. How Do We Use Your Data?

We are committed to protecting your privacy, and will only use your personal information in accordance with applicable Data Protection Legislation.

5.1 We use your data to provide the best possible products and services to you. This includes:

5.1.1 to perform our obligations, including:

- supplying Our products and services to you;
- authorising payments; and
- providing and managing your access to Our Site.

5.1.2 where you have expressly consented to us doing so, including:

- supplying you with email Insert Type of Email e.g. newsletters, alerts etc. that you have subscribed to (you may unsubscribe or opt-out at any time by using a link in our newsletter);
- analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- responding to communications from you; and
- where you make an enquiry or request any particular information, to respond to that enquiry and provide the requested information.

5.1.3 where it is necessary for compliance with legal obligations, including:

- for record keeping and regulatory compliance purposes; and
- for carrying out checks to prevent money laundering.

5.1.4 where We otherwise have a legitimate interest in doing so, including:

- carrying out checks to prevent fraud to protect us from dishonest activity;
- undertaking surveys or market research to enable us to improve the service We offer; and
- ensuring that our website is presented in the most effective manner for you and your computer.

5.2 In some cases, the collection of data may be a statutory or contractual requirement, and We will be limited in the products and services We can provide you without your consent for Us to be able to use such data.

5.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message, or post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Data Protection Legislation.

5.4 Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us. Please note however that the withdrawal of your consent will not affect any use of your personal information made before you withdrew your consent.

6. How and Where Do We Store Your Data?

- 6.1 We only keep your data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it. We keep all customer, employee and contractor data as long as it is permitted by law. All confirmed members of our email lists are kept until they unsubscribe. In any event, We will conduct an annual review, to ascertain whether We need to keep your data.
- 6.2 Some or all of your data may be stored or transferred outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store or transfer data outside the EEA, We will take all reasonable steps required by law to ensure that your data is treated as safely and securely as it would be within the EEA and under Data Protection Legislation. Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site.
- 6.3 Steps We take to secure and protect your data include:
- 6.3.1 Encrypting data communications between your computer and our website using SSL technology
 - 6.3.2 Encrypting sensitive data such as passwords
 - 6.3.3 Up-to-date Endpoint (Malware and Anti-Virus) protection
 - 6.3.4 Using technical and organisational steps, We will store it on our database within a secure network.
- 6.4 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

7. Do We Share Your Data?

- 7.1 We may share your data with other companies in Our group. This includes Our subsidiaries. Where you provide personal information to one company within Our group it may be shared with other companies within Our group. This is in our legitimate interests to enable us to operate Our group effectively and to enable us to provide you with an efficient service.
- 7.2 We may contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law. We currently contract with:
- a) delivery companies by sharing your name and delivery address;
 - b) providers of outsourced services, such as hosting and IT support or maintenance services (to the extent necessary for the provider to provide those outsourced services to us); and

- 7.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.
- 7.4 In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

8. What Happens If Our Business Changes Hands?

- 8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Statement, be permitted to use the data for the purposes for which it was originally collected by Us.
- 8.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

9. How Can You Control Your Data?

- 9.1 When you submit information via Our Site, you may be given options to restrict Our use of your data. We aim to give you strong controls on Our use of your data (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails at the point of providing your details and by managing your Account).
- 9.2 You may also wish to sign up to one or more of the preference services operating in the United Kingdom: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. Rights of Retention, Updating and Removing Information

Where you provide us with personal information We may retain this information for future use, including:

- undertaking surveys or market research regarding your purchase or regarding your experience of dealing with us;
- providing you with news and updates of a type you have asked to receive;
- monitoring fraud and other illegal or unlawful activity; and
- record keeping purposes.

- 10.1 The duration for which We retain your personal information will differ depending on the type of information and the reason why We collected it from you. However, in some cases personal information may be retained on a long term basis: for example, personal information that We need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.
- 10.2 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 10.3 You may restrict your internet browser's use of Cookies. For more information, see section 12.
- 10.4 You may withdraw your consent for Us to use your personal data as set out in section 5 at any time by contacting Us using the details set out in section 15, and We will delete Your data from Our systems. However, you acknowledge this may limit Our ability to provide the best possible products and services to you.
- 10.5 Your decision to stop receiving information from Us may result in the deletion of some of the personal information that We hold about you, but We may still retain personal information We require for other purposes, including where it is required for record keeping purposes.
- 10.6 In certain circumstances you may be entitled to request the erasure of personal information that We hold about you. To make a request of this nature, please contact us, providing full details of the personal information you want to be erased and the reason(s) for your request. We will consider all requests upon receipt and confirm to you whether We are able to agree to your request.

11. How Can You Access Your Data?

You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held). Please contact Us for more details at info@steadfast-group.com or using the contact details below in section 14.

12. What Cookies Do We Use and What For?

- 12.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. For more details, please refer to section 5, above, and to section 12.6 below. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.
- 12.2 By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. We use third party Cookies on Our Site for collecting analytics data on web site visits. For more details, please refer to section 5, above, and to section 12.6 below. These Cookies are not integral to the functioning of Our Site.
- 12.3 All Cookies used by and on Our Site are used in accordance with current English and EU Cookie Law.

- 12.4 Before certain third-party Cookies are placed on your computer or device, you will be shown a pop-up message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 12.5 Certain features of Our Site depend on Cookies to function. [Your Country] and EU Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 12.6. Your consent will not be sought to place these Cookies. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 12.10, but please be aware that Our Site may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 12.6 The following Third party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
EV_SESSION_TOKEN	E Vance	Stores your preferences in relation to the use of cookies

- 12.7 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. This, in turn, enables Us to improve Our Site and the products and services offered through it. You do not have to allow Us to use these Cookies, as detailed below, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you. [Find out more about Google Analytics cookies.](#)
- 12.8 The analytics service(s) used by Our Site use(s) Cookies to gather the required information. Certain of these Cookies may be placed immediately when you first visit Our Site and it may not be possible for Us to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below in section 12.10.

12.9 The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	Third	Google Analytics	Used to distinguish users.
_gid	Third	Google Analytics	Used to distinguish users.
gat	Third	Google Analytics	Used to throttle request rate.
_utma	Third	Google Analytics	Used to track the number of times you visit the site
_utmb	Third	Google Analytics	Used to determine new sessions/visits
_utmc	Third	Google Analytics	Used to determine new sessions/vistis
_utmt	Third	Google Analytics	Used to throttle the rate of service – this limits the collection
_utmz	Third	Google Analytics	This keeps track of where you came to our site from

12.10 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.

12.11 You can choose to delete Cookies at any time however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

12.12 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.

13. Summary of Your Rights under GDPR

Under the GDPR, you have:

13.1 the right to request access to, deletion of or correction of, your personal data held by Us;

13.2 the right to complain to a supervisory authority;

- 13.3 be informed of what data processing is taking place;
- 13.4 the right to restrict processing;
- 13.5 the right to data portability;
- 13.6 object to processing of your personal data;
- 13.7 rights with respect to automated decision-making and profiling (see section 14 below).

To enforce any of the foregoing rights or if you have any other questions about Our Site or this Privacy Statement, please contact Us using the details set out in section 15 below.

14. Automated Decision-Making and Profiling

14.1 In the event that We use personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on You, You have the right to challenge to such decisions under GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from Us.

14.2 The right described in section 14.1 does not apply in the following circumstances:

- a) The decision is necessary for the entry into, or performance of, a contract between the You and Us;
- b) The decision is authorised by law; or
- c) You have given you explicit consent.

14.3 Where We use your personal data for profiling purposes, the following shall apply:

- a) Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b) Appropriate mathematical or statistical procedures will be used;
- c) Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d) All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling.

15. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at info@steadfast-group.co.uk by telephone on 01473 834144 or by post at Steadfast (Anglia) Limited, 4 Columba, Orion Avenue, Ipswich, Suffolk IP6 0LW. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 11, above).

16. Security and Complaints

The protection of your personal information is very important to Us and We have in place various security measures to ensure that your personal information is kept secure.

However, you should be aware that the method you use to get in contact with Us, such as email or post, may not be entirely secure and your personal information may be susceptible to being intercepted in transit. Equally, your personal information is at risk if a malicious third party gains access to any place where your personal information is stored, such as your email account.

In the unlikely event that you have any concerns about how We use your personal information, please contact Us as described in Section 15 above. This includes situations where you want to request the rectification or erasure of your personal information, restrictions to be placed around how We use your personal information, or to object to a particular use.

If you make a complaint about our handling of your personal information, it will be dealt with in accordance with Our complaints handling procedure.

If We are unable to resolve your complaint, you may make a complaint to the Information Commissioner's Office. Please see <https://ico.org.uk/make-a-complaint/> for more information.

17. Changes to Our Privacy Statement

We may change this Privacy Statement as We may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Statement on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

We hope that the contents of this privacy notice address any queries that you may have about the personal information We may hold about you and what We may do with it. However, if you do have any further queries, comments or requests, please contact Us as described in Section 15 above.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/your-data-matters/>.

We may amend this Privacy Statement at any time.