



PRIVACY NOTICE – RUSSELL BUILDING PRODUCTS LIMITED T/A RUSSELL ROOF TILES

INTRODUCTION

Russell Building Products Limited t/a Russell Roof Tiles (“RRT”) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you provide us with personal data, for instance with a view to trading with us or becoming a trading partner, visit our sites or our website (regardless of where you visit it from) or use the RRT POD (Proof of Delivery) App and tell you about your privacy rights and how the law protects you.

We have separate specific Privacy notices for Employees and Job Applicants.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Russell Building Products Limited t/a Russell Roof Tiles collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service.

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 notice 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.

CONTROLLER

Russell Building Products Limited t/a Russell Roof Tiles is the controller and responsible for your personal data (collectively referred to as “Russell Roof Tiles”, “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy officer using the details set out below.

CONTACT DETAILS

Our full details are:

Russell Building Products Limited t/a Russell Roof Tiles

Company number: 7685988

VAT registration number: GB 115 885 496

Company Address: Bushton Works, Wetmore Lane, Burton-on-Trent, Staffordshire, DE14 1RH

Data privacy officer: Araminta Chesters

Email address: hr@russellrooftiles.com

Telephone number: 01283 517070

www.russellrooftiles.com

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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.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 3 August 2022 and historical versions can be obtained by contacting us using 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

This 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 notice of every website you visit.

2. 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).

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, job title, gender and username or similar identifier including car registration number and CCTV images.
- **Contact Data** includes billing address, delivery addresses, site addresses, branch addresses, email addresses, current employer and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Location Data** includes the geographic location, date and time that you capture the images you upload to the RRT POD App. **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. The RRT POD App also captures your unique IMEI (International Mobile Equipment Identity) number, to identify your device.
- **Profile Data** includes your username and password, purchases or orders made by you, information viewed or requested by you, sales enquiries from you, fixing specifications created by you and any account preferences.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **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 notice.

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

RRT POD APP

Handling of Mobile device and Call Data

- The RRT POD App may request permission to make and manage phone calls. This request typically appears on Android devices, and it relates to the device IMEI (International Mobile Equipment Identity) being captured, in order to uniquely identify a device.
- Russell Roof Tiles and the RRT POD App do not access call history in any way.

Location Tracking

- The RRT POD APP may request permission to access location data for the purpose of capturing a static location value at the point the delivery notes and delivery photos are processed. This is used to identify the actual location that our tiles have been delivered to.
- Russell Roof Tiles and the RRT POD App do not track your device location at any time other than at the point of capturing and processing the delivery documentation.

Photo library

- The RRT POD App requires permission to access the camera and photo library (camera roll) on your device in order to capture proof of delivery documents and images. Permission to access the camera is a fundamental requirement of the RRT POD App.
- The RRT POD App will also request permission to access the photo library / camera roll. This supports the user in taking pictures in advance of submission, e.g., where it is not possible to capture the delivery photos at the same time as the signed proof of delivery note.
 - E.g. where product is offloaded to be moved by contractors on the site, the photos of the product on the delivery vehicle can be captured via the normal camera, then attached to the delivery note later.
 - Example, in bad weather it is sensible for the driver to process the delivery note capture in their cab, using photos from the camera rather than capturing in real time.
- Russell Roof Tiles and the RRT POD App do not upload any photos from your library other than those you select and review prior to submitting a delivery note.
- If an image is accidentally uploaded and submitted to the RRT POD App that is not of our product or the product delivery location, then the User should email itsupport@russellrooftiles.com with the POD number to request deletion of the unrelated images. Any such images where deletion has been requested will not be shared with any third parties, except as required by law.

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.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, including:

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Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us through our Contact area. This includes personal data you provide when you:

- sign into one of our site visitor books;
- provide health & safety information such as Risk Assessments or Method Statements or similar;
- request a sample through our website or via fax, email, telephone or in person;
- request a quotation through our website or via fax, email, telephone or in person;
- ask for information or guidance using our Ask the Experts area;
- ask for information or guidance directly from our sales, technical or other teams or attend a training session run by us;
- ask to open a trading account with us, specify our products on your sites or ask us to supply one of your suppliers;
- create an account on our website;
- subscribe to our E-Bulletins or other publications;
- request marketing to be sent to you;
- submit a CV or job application;
- report a problem with our website;
- use the RRT POD App;
- Use the RRT Customer Portal or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may 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. Please see our cookie policy, which is available on our website for further details. Technical data, such as device IMEI data will also be captured by Users when they use the RRT POD App.

We may also collect Identity Data using CCTV.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - analytics providers such as Google who are based outside the EU and MailChimp, Juno (website hosting) and SES (Fixing specification software providers) who are based inside the EU; and
 - search information providers such as Experian, who are based inside the EU
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services, who are based inside the UK.
- Identity and Contact Data from data brokers or aggregators
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. 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.
- 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 or regulatory obligation.

Please see below to find out more about the types of lawful basis that we will rely on to process your personal data.

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Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us using the contact details above.

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer, vendor or key business partner	(a) Identity (b) Contact	Performance of a contract with you or one of your suppliers
To process your job application	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary to comply with a legal or regulatory obligation e.g. Employment Law and Health & Safety (c) Necessary for our legitimate interests (to employ the best applicant for each vacancy)
To process and deliver your order or purchase your products including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Responding to feedback	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you or your suppliers (b) Necessary for our legitimate interests (e.g. to recover debts due to us, to prevent or investigate theft or fraud, or for health & safety considerations)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you or one of your suppliers (b) Necessary to comply with a legal or regulatory obligation e.g. Health & Safety (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business including our POD App and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (e.g. for running our business, provision of administration and IT services, network security, to prevent/investigate theft and fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal or regulatory obligation (e.g. Health & Safety)

		(c) Necessary to prove that our products have been delivered undamaged to the correct delivery location
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) Profile (d) Usage (e) Marketing and Communications (f) Technical	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 use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (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) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- We have an Unsubscribe option at the bottom of all E-Bulletins, Technical Enquiries and Marketing E-mails.
- You may email us at technical@RussellRoofTiles.com

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

OPTING OUT

You can ask us 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, product/service experience or other transactions.

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 the Cookie policy on our website.



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.

5. 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 paragraph 4 above.

- External Third Parties, such as those set out in the Glossary.
- Specific third parties such as Google, Experian, Juno (website hosting), MailChimp and SES (Fixing specification software providers).
- 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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the European Economic Area (**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 certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- 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.

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

7. DATA SECURITY

SECURITY MEASURES

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

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a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

KEEPING YOUR CREDENTIALS SAFE

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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.

8. DATA RETENTION

HOW LONG WILL YOU USE MY 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 product guarantee, legal, statutory, health & safety, environmental, accounting, tax 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.

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

In some circumstances you can ask us to delete your data: see Request erasure in the Glossary for further information.

In some circumstances we may 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.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please refer to the Glossary below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

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 may refuse to comply with your request in these circumstances.

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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 may 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.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your 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.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

EXTERNAL THIRD PARTIES

- Service providers acting as processors based in the UK, US and Germany who provide IT and system administration services such as Kanuka (web hosting), SES (fixing specification software services), Infor (ERP SaaS), Amazon Web Services (ERP hosting).
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK, Mexico and the US, who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

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 the personal data that we hold about you. 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.

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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 of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen. 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.

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.