PRIVACY POLICY

1. GENERAL

GDC Group Ltd (registered in England and Wales No.01313016), Ability Projects Ltd (registered in England and Wales No.04088764) and Glen Dimplex Heating & Ventilation Ireland uc (registered in Ireland no. IE00049461) are trading as Glen Dimplex Heating and Ventilation ("GDHV"). GDC Group Ltd and Ability Projects Ltd are at Millbrook House, Grange Drive, Hedge End, Southampton, Hampshire, SO30 2DF. Glen Dimplex Heating & Ventilation Ireland uc are at Barn Road, Co Louth, Dunleer, Co Louth 221213. Together with any group companies ("**we**" "**us**" "**our**") are committed to protecting and respecting your privacy. For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2. VISITORS TO OUR WEBSITE

2.1 We may collect and process personal data about you in the following circumstances:

2.1.1 when you complete forms on our website (**"Site"**). This includes your name, postal address, telephone number, email address and any other details required, which is provided at the time of registering to use our Site, where you ask us to contact you about our goods or services, subscribe to our mailing list, or subscribe/request or goods or services;

2.1.2 whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;

2.1.3 details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access (see section 2.2.2 on Cookies below); and

2.1.4 whenever you disclose your information to us, or we collect information from you in any other way, through our Site.

2.2 We may also collect data in the following ways:

IP Address

2.2.1 We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device's operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Cookies

2.2.2 Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

2.3 We may use your personal data for our legitimate interests in order to:

2.3.1 provide you with information, or services that you requested from us;

2.3.2 allow you to participate in interactive features of our Site, when you choose to do so;

2.3.3 ensure that content from our Site is presented in the most effective manner for you and for your device;

2.3.4 improve our Site and services;

2.3.5 process and deal with any complaints or enquiries made by you; and

2.3.6 contact you for marketing purposes where you have signed up for these (see section 6 for further details).

Website Links

Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data and we do not accept any responsibility or liability for these policies. When you leave our Site, we encourage you to read the privacy notice/policy of every website you visit.

3. CUSTOMERS

3.1 We will collect details such as your name, postal address, telephone number, email address and financial information (such as credit and debit card details) when you order goods or services from us. We will use this information to process your order and comply with our contractual obligations. We may also collect personal data when you register for an account on our website, correspond with us via phone, email, SMS or live-chat, when you enter a competition or a promotional survey, when you report a problem to us or when you register a product warranty.

3.2 In order to perform our contact with you, we may also need to share personal data with third parties such as payment providers and postal service organisations to assist in the delivery of goods or services you have ordered;

The following categories of third parties work on our behalf: Our wholesalers and distributors that help us sell products and services. Organisations that help us respond to you and provide services to you. Organisations that help us deliver products and services to you. Companies that assist our marketing, helping us understand how well our advertising works, so that we can reach more people interested in our products and to set cookies on our website. Social media platforms who serve advertising on our behalf. Companies that help us with product services and repairs, those that offer a mailing service, those processing product purchases, those offering financial or audit services, IT data storage & security or insurance claims.

3.3 We may also advertise your feedback on our website and marketing materials (subject to obtaining your prior consent where necessary);

3.4 We will retain your information as long as we require this to provide you with the goods or services ordered from us. The actual period for which we store your personal information will vary depending on the type of personal information and how it is used. For example when you buy a product from us, we will store information about you and your purchase for at least the term of your warranty or guarantee which varies in time. Where you have subscribed to receive marketing correspondence from us we will keep your personal data for the period of time described in section 6 below.

4. SUPPLIERS

We will collect details such as name, postal address, telephone number and email address in order to contact you about goods or services ordered with you, to place further orders and to pay you for the goods and/or services supplied. We will keep the personal data for 6 years further to being provided with the goods/services.

5. 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 the 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

our 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.

6. MARKETING

6.1 In addition to the uses described in sections 2-4 above, where you indicate you would like to receive marketing correspondence from us, subscribe to our mailing lists or newsletters, enter into any of our competitions or provide us with your details at networking events we may use your personal data for our legitimate interests in order to provide you with details about our goods, services, business updates and events which we think may be of interest.

6.2 You have the right to opt-out of receiving the information detailed in section 6.1 at any time. To opt-out of receiving such information you can:

6.2.1 tick the relevant box situated in the form on which we collect your information;

6.2.2 clicking the unsubscribe button contained in any such communication received; or

6.2.3 email us at gdhvprivacy@glendimplex.com or call 0344 879 3586 (UK) 00353 416872000 (EU and Ireland) providing us with your name and contact details.

6.3 Where you have subscribed to receive marketing correspondence from us we will keep personal data for up to 6 years from when you provide us with your consent.

6.4 We currently work with Domestic & General for the provision of product after-care (see privacy policy) and also Really B2B (see privacy policy) concerning our business customers but reserve the right to introduce more companies here where appropriate.

7. MONITORING AND RECORDING

We may monitor and record communications with you (such as telephone communications, emails and live chat) for the purpose of, for example, quality assurance, training, fraud prevention and compliance. We also have CCTV cameras installed in our premises for the purpose of crime prevention and for health and safety reasons. We retain such information for 7 days.

8. AUTOMATED PROCESSING

8.1 We use automated processing to analyse your contact with us and offer you products and services that may be of interest to you.

8.2 We may carry out a credit check on our customers:

8.2.1 so that we can make credit decisions about you; and

8.2.2 to prevent fraud and money laundering.

8.3 Our search won't be recorded on the files of the credit reference agency.

8.4 If further to undertaking a credit check you receive a low credit score, we reserve the right not to supply you with goods or services on credit and/or require upfront payment for the goods or services you wish to purchase.

8.5 If you provide false or inaccurate information and we suspect fraud, we will record this.

9. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

9.1 We will only use your personal data where the law allows us to. Most commonly, we will use your personal data in the following circumstances:

9.1.1 for performance of a contract we enter into with you;

9.1.2 where necessary for compliance with a legal or regulatory obligation we are subject to;

9.1.3 where necessary in order to protect your vital interests in respect of a product you have purchased from us; and

9.1.4 for our legitimate interests (as described within this policy) and your interests and fundamental rights do not override these interests.

10. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

10.1 In addition to the third parties mentioned above, we may disclose your information to third parties for our following legitimate interests as follows:

10.1.1 to staff members in order to facilitate the provision of goods or services to you;

10.1.2 to our affiliated entities to support internal administration;

10.1.3 IT software providers that host our website and store data on our behalf;

10.1.4 professional advisers including consultants, lawyers, bankers and insurers who provide us with consultancy, banking, legal, insurance and accounting services;

10.1.5 HM Revenue and Customs, regulators and other authorities who require reporting of processing activities in certain circumstances; and

10.1.6 third parties who we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other business or merge with them. If a change happens to our business then the new owners my use your personal data in the same way as set out in this privacy policy.

10.2 We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

10.3 We will not sell or distribute personal data to other organisations without your approval.

11. CROSS-BORDER DATA TRANSFERS

11.1 Where permitted by applicable law, we may transfer your personal data to the United States and other jurisdictions outside the European Economic Area ('EEA') for the purposes set out in this privacy policy.

12. DATA SECURITY

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

12.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our Site; any transmission is at your own risk.

12.3 Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

13. ACCESS TO, UPDATING, DELETING AND RESTRICTING USE OF PERSONAL DATA

13.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.

13.2 Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, please send an email to gdhvprivacy@glendimplex.com. In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.

13.3 You can also ask us to undertake the following:

13.3.1 update or amend your personal data if you feel this is inaccurate;

13.3.2 remove your personal data from our database entirely;

13.3.3 send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract; or

13.3.4 restrict the use of your personal data.

13.4 We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

13.5 Please send any requests relating to the above to our Data Lead at gdhvprivacy@glendimplex.com, 0344 879 3586 (UK) & 00353 416872000 (EU and Ireland) specifying your name and the action you would like us to undertake.

14. RIGHT TO WITHDRAW CONSENT

Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at: Millbrook House, Grange Drive, Hedge End, Southampton, Hampshire, SO30 2DF, or gdhvprivacy@glendimplex.com, or 0344 879 3586 (UK) & 00353 416872000 (EU and Ireland).

CHANGES TO OUR PRIVACY POLICY

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal without your knowledge or consent where required by applicable law or regulation.

15. CONTACT US

We have appointed a Data Lead to oversee compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our Data Lead at gdhvprivacy@glendimplex.com, or 0344 879 3586 (UK) & 00353 416872000 (EU and Ireland). This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at https://ico.org.uk/global/contact-us/ (UK), https://dataprotection.ie/docs/Contact-us/b/11.htm (Ireland) and the national Information Commissioners Office you have in your local country.

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