

# Privacy Policy

## Keeping Your Details Secure

Here at Crescent Lighting we collect data from our customers in order to fulfil orders and, workshop tasks. We do this by guidance from the law and ensuring that we adhere to the latest GDPR guidelines.

Your privacy and feeling of security is paramount to us and we want you to know that when we record your details, through safely secure means so that they cannot be used by any third parties unless this is to fulfil your order requirements through a courier. We DO NOT sell on our customer database to any third parties, the details that we hold on our customers is only used in -house and stored for the legally required duration.

Below you will find details of how we store and use your data at Crescent Lighting and hopefully your mind will be put at rest in the knowledge that your information is safe with us. We may change or update this Privacy Policy from time to time and without notice, so please check back for any updates.

## Who are we?

### Crescent Lighting Ltd

**H2 Raceview Business park, Newbury, Berkshire.**

**RG14 5SA**

Registered Company Number: 03642724 VAT Number: GB 491 727 029  
Crescent Light have appointed a Data Protection Officers (DPO), who can be contacted on [Johnh@crescent.co.uk](mailto:Johnh@crescent.co.uk) should you have any questions or feedback about the way your data is handled.

## How we collect your information

We may collect personal information about you in the following ways:

### Data you give to us:

- o When you use our website;
- o When you send emails or letters to us;
- o When you take part in our competitions or promotions;
- o When you sign up to our newsletter or marketing;
- o When you apply for a job;
- o When you give us feedback

**Data we collect when you buy our products or use our services:**

- o Payment and transaction data;

**Data from third parties we work with:**

- o Social media networks
- o Public information sources
- o Google analytics - collects information about how visitors use our Digital Applications.

## What personal data do we collect?

We only collect data that we need to in order to complete your purchase or request, to enhance your experience with us or fulfil legal requirements.

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:

**Data provided by yourself:**

e.g. As part of signing up to our mailing list, Placing a telephone order or booking in a workshop job

- o **Identity data** - name, title of those buying our products or using our services.
- o **Contact data** - location, postcode, email address or telephone numbers.
- o **Transaction data** - details of the products and services you have purchased from us, including date and time of purchase and spend in relation to that transaction.

**Data collected automatically:**

As part of using our website and/or services we collect and process the following information:

**Technical data** - internet protocol (IP) address, your login data, device type, network, browser type and version, data usage, 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 our website.

**Profile data** - purchases or orders made by you, feedback and survey responses, preferences about the use of the services (including whether you are interested in certain events that we offer)

**Employment Data** - including details of your qualifications, CV, employment history (including remuneration history) and present employment circumstances, your job title, the name and contact information of your employer (if applicable), and details of your referees.

**Usage data** - information about how you use our website, products and services.

We may also record or monitor calls, emails, text messages and other correspondence for training purposes.

### **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 our services). In this case, we may have to cancel a service you have with us or refuse to accept your application to register with us.

## **How is your personal data collected?**

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

**Direct interactions.** You may give us your Identity, Contact, Financial, Employment and Profile Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

apply to register for, or request, our services; or

request marketing information to be sent to you or agree that we can send marketing information to you.

**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, and other similar technologies. Please see our cookie policy for further details.

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

Technical Data from the following parties:

o **Analytics providers** such as Google;

o **Advertising networks;** and

o **Search information providers;**

o **Identify and Contact** Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

o **Your referees** (where you have provided us with their details)

o **Job boards**, online CV libraries, employment agencies, umbrella companies (and similar).

## **Use of cookies**

In common with many websites, we use 'cookies' to help us gather information from visitors to our website.

A cookie is a small data file that our server sends to your browser when you visit the website. The use of cookies helps us to assist your use of certain aspects of the website and helps us to improve the website to deliver a better service for you.

We may use your personal information from cookies for the following purposes:

o the IP address from which you access the site

o the type of browser and operating system used to access the site

o the date and time of your access to the site

o the pages you visit

o the Internet address of the website from which you accessed the site

o to recognise repeat visitors for statistical / analytical purposes.

o anonymous tracking of interaction with online advertising. e.g. to monitor the number of times that a banner ad is displayed and the number of times it is clicked.

You can delete cookies at any time or you can set your browser to reject or disable cookies. If you do disable cookies some functions on the site may not work correctly.

## How we use your personal information

We may use your personal data for any or all of the following purposes:

- o To provide a high level of customer service, delivery or to contact you if ordering a product and to notify you of any security and data breach alerts, and technical notices (including services messages and updates to our Digital Applications and terms)
- o To help operate, maintain, and improve our offering and our digital applications
- o To understand our customers better and to improve our service
- o To communicate with you about our offers, promotions, upcoming events, reviews, and other news
- o To facilitate profiling, segmentation, and personalisation - these may be based on location, preferences, interests, and past actions
- o To meet our legal obligations and for establishing, exercising, or defending our legal rights
- o To compile reports and to help us understand and improve our digital applications
- o To enable us to carry out targeted online advertising more likely to be relevant to you

?We will only use personal information about you if we have a legal basis to do so, and we are required to tell you what that legal basis is. We have set out in the table below: the personal information which we collect from you, how we use it, and the legal ground on which we rely when we use the personal information.

In some circumstances we can use your personal information if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a genuine and legitimate business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below.

| <b>Purpose/Activity</b>  | <b>Type of data</b>  | <b>Lawful basis for processing including basis of legitimate interest</b>  |
|--|--|--|
| To provide our services to you as a customer. This may include: <ul style="list-style-type: none"><li>• keeping your personal data on file for a period of time. We will never store</li></ul> | <ul style="list-style-type: none"><li>• Identity</li><li>• Contact</li></ul> | Performance of a contract with you.<br>Necessary for our legitimate interest in providing the services you have requested. |

|   |   |  |
|---|---|--|
| <p>your personal data for longer than required.</p> <ul style="list-style-type: none"> <li>• to respond to your questions and enquiries.</li> </ul>                           |   | <p>Necessary for our legitimate interest in marketing our services to you.</p>   |
| <p>To process your order/purchase, and to manage payments or collect and recover money owed to us.</p>  | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> </ul>                  | <p>Performance of a contract with you.<br/> Necessary for our legitimate interest in providing the services you have requested.<br/> Necessary for our legitimate interest in marketing our services to you.</p>   |
| <p>To enable you to partake in a competition or to complete a survey.</p>   | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> </ul>                  | <p>Necessary for our legitimate interest (to study how customers use our service and to grow our business).</p>  |
| <p>To manage our relationship with you which will include notifying you about changes to our terms and conditions or privacy policy</p>                                       | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Marketing</li> </ul> | <p>Necessary to comply with a legal obligation<br/> Necessary for our legitimate interests (to keep our records updated)</p>   |
| <p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>                    | <p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br/> Necessary to comply with a legal obligation</p> |
| <p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>   | <ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>  | <p>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)</p>   |

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests - we will 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).

## **Who we share your personal information with**

We will never sell your personal details to any third party without your permission. In order to provide you with our services and meet our legal obligations, we only share your data with 3rd parties, in the following circumstances:

- o to fulfil your order;
- o to verify your identity;
- o to authorise debit/credit card payments and any other transactions authorised by the customer;
- o to manage and maintain the accuracy of your records;
- o to handle complaints and improve customer service;
- o to meet legal obligations, for example, for the purposes of national security, taxation and criminal investigations;
- o if Crescent Lighting is acquired by a third party, in which case personal data held by it, about its customers, will be one of the transferred assets.

We'll never make your personal data available to anyone outside of Crescent Lighting for them to use for their own marketing purposes without your prior consent.

## **Third party links**

Our 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 or policy of every website you visit.

## **International Transfers**

Our external PMS provider is based outside the European Economic Area (EEA) and their processing of your personal data will involve a transfer outside the EEA. Wherever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it as that afforded to it by us. 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 or if the service provider has entered into a specific contract with us approved by the European Commission. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## Data Security

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

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.

## Data retention - How long will we keep your personal data for?

We will keep your personal information for as long as you are our customer or tenant.

After you stop being a customer or tenant, because you have stopped regularly using our services or buying our products, we may keep your personal information for up to 6 years for one of the following reasons:

- o to respond to any questions or complaints from you;
- o to maintain our records;
- o to comply with laws applicable to us.

We may, however, keep your personal data for longer than 6 years if we need to fulfil our contractual obligations to you, the law requires us to maintain it for a longer period or you have not withdrawn your consent.

## Your Rights

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

**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, your personal data in a structured, commonly used, machine-readable format. 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.

If you wish to exercise any of the rights set out above, please contact our data protection manager.

### **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.

### **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.

## **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 our data processing manager.

**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.

### **THIRD PARTIES**

- o External Third Parties
- o Clients (in relation to applications for positions made with your consent).
- o Our external CRM provider -Pipedrive.
- o Professional advisers, including lawyers, bankers, auditors and insurers based who provide legal, banking, insurance and accounting services.
- o HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- o Any third party to whom we are required by law to disclose data in connection with the detection of crime, the collection of taxes or duties, in order to comply with any applicable law or order of a court of competent jurisdiction, or in connection with legal proceedings.

## **Not happy? Making a complaint**

Please let us know if you are unhappy with how we have used your personal information by contacting the Data Protection Officer (details can be found in section 1) so that we can try and help.

If you are not satisfied with our response, or believe we are not processing your data in accordance with the law, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). You can find their contact details at [www.ico.org.uk](http://www.ico.org.uk). We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

We may change or update this Privacy Policy from time to time and without notice, so make sure you check back occasionally. If we change our Privacy Policy, we will publish those changes on this page. Thanks for reading, hopefully you are now happy that we securely look after your personal data.