

## Privacy Policy - Customers, Suppliers & Website users

### **Introduction**

Rinnai UK Limited ("RUK") is established and incorporated in England and Wales (company number 1247352) having its registered office at 9 Christleton Court Manor Park, Runcorn WA7 1ST.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data either as customer (whether a consumer or business trader), as a supplier of goods and services to RUK or as a visitor to our RUK website and tell you about your privacy rights and how the law protects you.

### **1. Important information**

#### **Purpose of showing you this privacy policy.**

This privacy policy aims to give you information on how RUK collects and processes your personal data including any data you may provide through our website or when you sign up as a customer (either as a consumer or trader) online for an account, purchase a product or service, supply us with goods or services, make an enquiry or take part in a competition.

We do not knowingly collect data relating to children.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

#### **Controller**

Unless we state otherwise RUK is the data controller of your personal data and responsible for the collection and use of such data in accordance with this Privacy Policy. We will refer to RUK by name or use the words "we", "us" or "our" to mean RUK in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, or to update any personal data we hold for essential purposes please contact us at the address shown at the foot of this Policy-

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](http://www.ico.org.uk)). Our Data Protection registration number is Z830533X. We would, of course, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **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 actions or privacy statements.

When you leave our website, we recommend that you 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 relate to companies, although we may hold the contact details of certain individuals within the company.

We may collect, use, store and transfer different kinds of personal data about individuals as follows:-

- First Name
- Last Name
- Username or other Identifier
- Contact Details including Address, Telephone Numbers and Email Address
- Payment Card Details (not stored)
- Bank Details
- Order Details
- Images on CCTV at our premises
- Marketing Preferences

We do not collect any Special Categories of Personal Data about you, especially any which could be misconstrued as leading to discrimination of any sort.

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

In most cases we will only collect information directly from yourself with the intention of processing an order for the purchase or sale of goods and/or services, or the possibility of doing so in future.

As you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, Google analytics and other similar technologies for the purposes of improving our website.

In addition we use CCTV at our premises for the purposes of the prevention and detection of crime. Images are stored only for as long as we consider necessary for this purpose and are automatically over-ridden by time.

## **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 for the performance of a contract with you, or necessary for our legitimate interests or legal obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by unsubscribing by clicking on the unsubscribe link at the bottom of each marketing email or please do contact us.

## **Marketing**

We may use the information we have available 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 will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing. In future we will only collect data and use it for marketing purposes if you positively opt in at the time of providing this information.

## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by using the unsubscribe link at the bottom of the emails 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, warranty registration, 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 our website may become inaccessible or not function properly.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below.

We may have to notify HMRC for the purposes of legal obligation (for example VAT)

SagePay is the data processor for all card payments.

Frank Design Ltd is the data processor for all on-line customer accounts and profiles

We use MailChimp for the purposes of sending marketing emails.

We use Datel Computing Ltd for the purposes of supplying and supporting Sage Accounts and CRM software.

We require all the above 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.

## 7. 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 procedures in place 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

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 legal, accounting, or reporting requirements.

By law we have to keep basic information about our customers for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

**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 us as shown below.

**The Data Controller  
Rinnai UK Ltd  
9 Christleton Court  
Manor Park  
Runcorn  
WA7 1ST**

**Tel +44 (0)1928 531870**

**We will happily provide an appropriate email address over the telephone.**