# **Base Interiors Ltd Website Privacy Policy**

Base Interiors Ltd is committed to respecting the privacy of all visitors to its website and of its clients and contacts. You are invited to read the following privacy policy to understand how we protect and use and the information that you provide to us or that we retain about you. This will help you to understand what your rights are in relation to information that we hold.

This policy applies to information about living identifiable individuals only.

### Information gathered from our website

You may choose to provide personal information to us when you register on our website to ask us to contact you or sign up for our eNewsletter. You may be asked to provide information about yourself including (but not necessarily limited to) your name, title, postal address, telephone number and/or email address.

### Information gathered in relation to our services

If you request an estimate of costs for building or refurbishment work or become a client of Base Interiors Ltd, we will also need to obtain information to confirm your identity, including your name, title, company details and postal address, together with normal contact details for you and any other parties that will be involved in the contract. The information that we need will be explained to you by our contract relationship staff and/or set out in our formal engagement process.

### Information gathered automatically

We may also collect information automatically about your access and usage of our website. We may use your IP address, which is a numeric code that identifies a computer on the internet, to collect internet traffic data and information on your browser type and computer.

## How does Base Interiors use your information?

We will use your information for the specific purpose(s) for which it has been provided or collected by us, including:

- to provide information that you may request regarding the services we offer
- to contact you to introduce our building and refurbishment services
- to comply with our statutory and regulatory obligations
- to verify your identity for anti-money laundering purposes
- to deal with any feedback, queries or complaints that you may have

We may also use the information that we collect about you for marketing and business development purposes, including:

- to provide information about Base Interiors and the services we provide, which may be of interest to you
- to provide you with updates on relevant areas of our building and refurbishment activities
- to contact you about other activities and events that we may undertake

Information gathered automatically may be used to measure and analyse information on visits to our website, to update the website to improve the visitor experience and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

Furthermore, we may use your information to administer, support and improve our business generally and to enforce our legal rights.

## Legitimate grounds for processing your information

We must have a lawful basis for processing your information. This will vary depending on the circumstances for obtaining your information, but will typically include:

- the activities are within our legitimate interests as a building and refurbishment contractor seeking to engage with and provide services to prospective and current clients
- you have given consent for us to process your information in relation to our marketing activities
- we are completing necessary steps in relation to a contract to which you are a party or prior to you entering into a contract with Base Interiors, because you wish to engage us to carry out building or refurbishment activities for you
- the processing is necessary for compliance with legal obligations that we are subject to, including confirming your identity under our anti-money laundering requirements
- to protect your vital interests, if you were to visit our premises and fall ill or suffer an injury

If we legitimately process any special categories of information, which may reveal racial or ethnic origin; political opinions; religious or philosophical beliefs; health data or data concerning your sex life or sexual orientation, we must have a further lawful basis for the completion of the processing activities, which may include:

- where you have given us your explicit consent to do so
- where the processing is necessary to protect your vital interests or someone else's vital interests
- where you have made the information public
- where the processing is necessary for the establishment, exercise or defense of legal claims
- where the processing is necessary for reasons of substantial public interest

### Marketing

If you become a client of Base Interiors, we may use your personal information to send you information that we think may be of interest to you or your business. This falls within our legitimate interests as a building and refurbishment contractor to use your information for marketing purposes.

You will be given the opportunity to confirm whether or not you wish to receive direct marketing communications from us, either at the time you provide your details and/or within the marketing communication itself.

At any point, if you change your mind about being contacted by us, or any of your personal details change, or you believe that any information we hold about you is either inaccurate or out-of-date,

please contact us by emailing <u>ehaggin@baseinteriors.com</u> or writing to us at Base Interiors Ltd, 15 Berkeley Mews, London, W1H 7AX. Alternatively, you can call us on 020 7487 3222.

### **Disclosure of your information**

The information you provide to Base Interiors will usually be held on our computers in the UK and accessed by staff working in the UK. Information you provide to us may be transferred to, stored or processed by third party organisations which process data on our behalf. These third parties may store or process your information in the UK or elsewhere, including outside the EEA. These third parties may include suppliers of administrative and support services, suppliers of other specialist products or outsourced IT applications and systems, including cloud-based platforms.

We may also transfer your information to other organisations with whom we are working on client projects or to whom we are referring you.

Additionally, we may be obliged to disclose information under certain laws, by order of court or other competent regulatory body or may be permitted to disclose it under applicable data protection laws.

Finally, if Base Interiors merges with another business entity, divests part of its business or carries out internal corporate restructuring, your information may be disclosed to Base Interiors' new business partners or owners or the new corporate entities.

We will take all reasonably practicable measures to ensure that your data is treated securely and in accordance with this privacy policy.

#### Protection of your information

We have implemented relevant administrative, technical and physical controls for our website, which are designed to mitigate the risk of loss, misuse, unauthorised processing or disclosure of the personal information that we hold.

Where we transfer information to third parties to enable them to process it on our behalf, we ensure that these third parties can meet or exceed relevant legal or regulatory requirements for transferring and securing information under their control.

We will also ensure that where any information is transferred to a country or international organisation outside of the UK / EEA, we will comply with the relevant legal rules governing such transfers.

We will retain your personal information for no longer than necessary for the purposes that it was collected. Details of our information retention policy is available upon request.

### Your rights

You have certain rights in relation to your personal information. However, these rights do not apply in all cases or to all information that we hold about you. In certain circumstances, we may need to continue to hold and process information to establish, exercise or defend our legal rights. You have the right to request that we:

- Provide you with a copy of the personal information that we hold
- Update your personal information where it is incorrect or out-of-date
- Delete personal information that we hold
- Restrict the way in which we process your information
- Consider any valid objections to our processing of your personal information
- Provide information you have given to us to a third-party provider of services, where our lawful basis for processing is consent and where processing is automated

We will respond to your request, including providing information on whether the rights apply in the particular circumstances, within the statutory time period. If we are unable to confirm your identity, we may require you to provide further information in order for us complete verification of your identity.

### Changes to this policy

We may make changes to this policy from time to time as our business or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purposes for which it was obtained or otherwise than is permitted by applicable law. If we intend to use your information for any other purposes, we will notify you in advance, wherever possible.

#### How to contact us

If you would like to contact us to discuss this policy or how we use your personal information, to exercise your rights, to provide feedback or make a complaint about use of your information, please contact us as follows:

- Emily Haggin –Data Protection Manager
- <u>ehaggin@baseinteriors.com</u> or on 020 7487 3222
- Base Interiors Ltd, 15 Berkeley Mews, London, W1H 7AX

You can also contact the Information Commissioner's Office for information, advice or to make a complaint. The ICO can be contacted online at <a href="https://ico.org.uk">https://ico.org.uk</a>

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Stephen Moloney Director

