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## GDPR Policy and Procedure

### MANAGING THE POLICY

#### Ownership

This policy is owned by the Responsible Officer,

#### Governance

The implementation and success of this policy will be monitored by the Responsible Officer.

The following are accountable, responsible, consulted and informed in respect of this policy:

Responsible	Lauren Fanning
Accountable	Lauren Fanning
Consulted	
Informed	

#### Review

Review will be undertaken by the Lauren Graham every 12 months and reissued in its entirety.

Issue	Date	Reason
1.0	14-06-21	Original Policy
	June 2022	Annual Review

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## Compliance

All staff, members and contractors or others with access to council information must comply with this policy. If you do not understand the implications of this or how it may apply to you, seek advice from Human Resources.

## Equality and Diversity

Every policy must consider equality and identify any potential barriers or discrimination faced by people protected by equality legislation.

This Privacy Policy (together with our Website Terms of Use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This Privacy Policy also sets out how you can instruct us if you prefer to limit the use of that personal data and the procedures that we have in place to safeguard your privacy.

For the purpose of the General Data Protection Regulation (GDPR), the data processor is Us.

Our company name is **Aster Interiors**

Our registered address is **335 City Road, London, EC1V 1LJ**

Our nominated representative is **Scott Fanning**

Our telephone number is **0207 846 7371**

Our website address is **www.asterinteriors.com**

By using this website (the "Website") or submitting information to us, you signify your consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, you must not use the Website or submit information to us through or in connection with the Website or otherwise.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

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## 1. INFORMATION WE MAY COLLECT FROM YOU

We may monitor visits to the Website, in order principally, to ensure that it is easy to navigate, identify the areas that are of particular interest to visitors and generally improve the Website and services offered. The information we collect in this process will not identify you as an individual and it does not seek to identify individual visitors unless they volunteer their contact details through one of the forms on the Website.

In some circumstances our records may identify organisations visiting the Website and we may use that information in managing its relationship with those organisations, for example, in considering how to develop the services that it offers.

The personal information we hold about you will depend on the services you request from us and the use that you make of those services. We may collect:

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, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address 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.
- 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. This is used to note your interest in this Website; and details of your visits to our Website (including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access.
- Profile Data includes your username and password, purchases or orders made by you, your preferences, feedback and survey responses.
- 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

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- 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.
- 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.
- Information regarding your use of our services including but not limited to telephone numbers, SMS, MMS, emails and other electronic communications received or made by you and the date, time, cost and duration, of such communications, your browsing history (including web sites you visit) and location data, internet PC location for broadband, address location for billing, delivery, installation or your phone location;
- information that you provide by filling in forms and submitting information over the phone, by post, email, fax or on the Website. This includes information provided on registration for any one of our services, through surveys, by posting material on the Website or by requesting services from us;
- if you contact us, whether through the Website or otherwise (for example, by post, email, fax, phone, text message) we may keep a record of that correspondence. For example, if you submit a query, a complaint or a refund request, report a problem with our service or Website, or otherwise liaise with our customer service, technical support or any other department in our company we may keep such record;
- information obtained as a result of credit checks which you authorise us to carry out;
- records of communications between you and us relating to services provided by us to you;
- records of use made by you of services provided by us to you;
- calling line identification/connection logs. when you connect to our remote access servers;

The above information may include any personal information that relates to and identifies you, including but not limited to your name, date of birth, postal address, e-mail address, telephone number, bank account details, and any other information collected as set out in the above list.

We may check some of the information that you provide against third party databases to confirm that it is accurate.

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In some cases, for example where we carry out credit checks or collect information from organisations to whom we outsource functions, your personal information will be collected indirectly.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

## 2. HOW WE MAY USE THE INFORMATION COLLECTED FROM YOU

We may process this information for the purpose of:

- providing you with electronic communications services including, without limitation: (i) provisioning or connecting your services; (ii) network routing; (iii) investigating and fixing faults in relation to the services and (iv) investigating complaints;
- following up any payments that you may owe us, administering contractual agreements or arrangements necessary to provide services to you; informing you about services and events provided or organised by us that may be of interest to you;
- enhancing and personalising the services that we offer to you];
- administering accounts records;
- providing you access to all parts or features of our services or the Website;
- communicating with you on any matter relating to the provision generally of our services;
- dealing with your inquiries and requests, including contacting you if necessary;
- carrying out our obligations arising from any contracts entered into between you and us;
- processing your payment;
- contacting you for your views on our services and notifying you occasionally about important changes or developments to our services or the Website;
- carrying out market research campaigns;
- improving and developing our services or the Website;
- ensuring that content from our Website is presented in the most effective manner for you and for your computer or mobile device;
- performing research and statistical analysis and analysing markets and producing reports; and
- debt recovery or debt tracing, crime, fraud and money laundering compliance.

We may also use your personal information, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about this by email, post or telephone. If you prefer not to receive information from Us or from our selected third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data, (e.g. the order form or registration form) if applicable, or send an e-mail message via the 'Contact Us' link on this website

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Our contracts form part of our communications services plus other ancillary services such as mailing, credit checking, provisioning, billing, printing, verification of sales and fault fixing to external service providers. We may disclose your personal information to these organisations but only so that they can provide you with the services that we have contracted out.

We may disclose your personal information to other telecommunications service and equipment providers, our related corporate bodies, resellers, credit providers, credit reporting agencies, organisations to whom we outsource services, and our business partners and associates. At your request, we may disclose your information to directory providers so that your information can appear in telephone directories. Personal information shared with related corporate bodies may include your name, address, and service history.

We may analyse information about you including your calling, browsing, searching and location data on a personalised basis always in accordance with data protection legislation. We may transfer this data to authorised third parties and we may use it to tailor our (or our authorised third parties) offers, promotions, adverts or commercial communications.

We may also gather this information and statistics on aggregated basis for the purposes of monitoring the usage of the Website and our services and may provide such aggregate information to third parties such as advertisers, telecoms carriers, content providers our affiliated companies or prospective business partners. These statistics will not include information that can be used to identify you.

If you stop using our services or the Website, or your permission to use the Website or our services is terminated, we may continue to use and disclose your personal information in accordance with this Privacy Policy (as amended from time to time) and as permitted by law. However, if you wish us to stop e-mailing you with information in connection with the Website or our services, please send your request via the 'Contact Us' link on this website.

### **3. INFORMATION SECURITY**

This website is not intended for children and we do not knowingly collect data relating to children.

The internet is not a secure medium. However, we have put in place various security procedures with regards to the Website and your electronic communications with us, as set out in this policy.

Please be aware that communications over the internet, such as emails/webmails are not secure unless they have been encrypted. Your communications may route

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through a number of countries before being delivered – this is the nature of the World Wide Web/internet.

We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control. You must not share your password which gives you access to any of our services. Your passwords and any other secret information are your responsibility, and must not be disclosed to any third party.

We believe that we have appropriate policies, rules and technical measures to protect the personal data that we have under our control (having regard to the type and amount of that data) from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. Our web server is capable of up to 128bit SSL encryption. Note however, that our web server can only choose the highest common level with your browser. If you use older browsers, you may find that it only supports 40bit or 56bit encryption.

We may contract with third parties to provide certain services on our behalf. Please note that if they collect any personal data on their own behalf they would be obliged to provide you with their own privacy policy. You should review their privacy policies carefully.

All of our employees and data processors that have access to, and are associated with, the processing of your personal information are obliged to respect the confidentiality of our visitors' information.

We may need to disclose your data, if required by law or when requested to by regulatory bodies or law enforcement organisations, which may use your data for regulatory purposes.

The data you provide to us may be transferred to third parties located outside the European Economic Area ("EEA"). Countries outside the EEA do not always have adequate data protection laws and security measures. However, we will take reasonable steps to ensure that your data is processed by third parties in accordance with the data protection act 1998 and our privacy policy.

#### **4. TO WHOM WILL YOUR INFORMATION BE DISCLOSED?**

Your information may, for the purposes set out in this Privacy Policy, be disclosed for processing:

- to other electronic communications service and equipment providers;
- to organisations to whom we outsource services, and our business partners and associates; we will reasonably ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it;
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- to regulatory bodies for the purposes of monitoring and/or enforcing our compliance with any regulatory rules/codes or where required by law, regulation or legal proceedings;
- to a competent authority in response to a valid, legally compliant request by a competent authority;
- to our employees;
- where we, or an affiliate processing your data on our behalf, are compelled to do so by law;
- to third parties from whom you have chosen to receive marketing information;
- to auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes;
- to insurance companies and administrators where you decide to take an insurance policy through us;
- to any third party where such disclosure is required in order to enforce or apply our Website Terms of Use or our terms and conditions and/or other agreements, or to protect the rights, property, or safety of our company, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- to our other affiliates, including our respective partners, agents and sub-contractors (including prospective partners, agents and subcontractors). This may include your name, address, and service history;
- to prospective sellers or buyers of our business or any of our assets;
- to third-party consultants, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us; and
- in emergency situations when we have a reason to believe that someone's physical safety is at risk;

## 5. DATA RETENTION

We will only retain information for as long as this is needed including for billing and for accountancy purposes. However, in certain circumstances and to comply with the Regulation of Investigatory Powers Act 2000 (RIPA) and any other applicable legislation.

We may retain the information below for a minimum time of 6 months and no longer than 2 years:

- data necessary to trace and identify the source of a communication (telephone number, name and address of subscriber, sender's IP address, etc.);
- data necessary to identify the recipient of a communication (number dialled, name and address of recipient, IP address of recipient, etc.);
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- data necessary to identify the date, time and duration of a communication (date of the communication, start and end time of a telephone conversation, log-on and log-off time of internet access service);
- data necessary to identify the type of communication;
- data necessary to identify users' communication equipment or what purports to be their equipment;
- cell site data necessary to identify the location of mobile communication equipment; and
- digital Subscriber Line (DSL) or other end-point of the originator of a communication.

## **6. YOUR RIGHTS OF ACCESS IN RELATION TO YOUR INFORMATION**

You can write to us at any time to obtain a copy of your information and to have any inaccuracies corrected. Where appropriate, you may have your personal information erased, rectified, amended or completed. Please write to our registered address or email us via the 'Contact Us' link on this site.

Please quote your name and address. We should be grateful if you would also provide brief details of the information of which you would like a copy or which you would like to be corrected (this helps us to more readily locate your data).

We will require proof of your identity before providing you with details of any personal information we may hold about you. We may charge a fee of £10 to cover the administration costs involved in providing you with a copy of your information.

## **7. COOKIES**

Pieces of information transferred to your computer's hard disk from a website are known as cookies. They allow our Website to store information about your browsing patterns, making the Website more useful to you. Many major sites use cookies; in fact, they are commonly used throughout the internet to offer personalised services. Most browsers are automatically set to accept cookies. Each time you use our Website, the cookie is accessed. This way, we can track the features you use and the pages and content that you view on the Website to help personalise your experience. Where you are allocated log-in details, we may also use cookies (but only if you so choose) to let you automatically log-in to the Website so that you do not have to re-enter your email and/or password each time you visit.

You may disable cookie support on your browser but be aware that by doing so, you may lose certain features that require a cookie to work properly. We may use the information collected by the cookie to provide us with various statistics without identifying any individual.



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Please contact us via the 'Contact Us' link on this site if you require information about disabling any cookies on the Website.

## 8. YOUR CONSENT AND CHANGES TO THIS PRIVACY POLICY

By submitting any personal information to us, you consent to the use of information as set out in this Privacy Policy. We reserve the right to amend or modify this Privacy Policy and if we do so we will post the changes on the Website. It is your responsibility to check the Privacy Policy every time you submit information to us or place an order. Use will signify that you agree to any such changes.

In the event the purposes for processing personal information change, we will contact you as soon as practicable and seek your consent for the new purposes where such new purposes relate to a new additional purpose for processing which is not compatible or similar to the originally specified purposes.

## 9. THE GENERAL DATA PROTECTION REGULATION

We are registered as a Data Processor under the terms of the General Data Protection Regulation and we ensure we comply with all the protections the Regulation affords to you. Our registration number is also noted on this website.

## 10. USE OF YOUR PERSONAL INFORMATION SUBMITTED TO OTHER WEBSITES

We are not responsible for the privacy policies and practices of other websites even if you accessed the third party website using links from our Website.

We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have concerns or questions.

## 11. CONTACT

If you have any questions about our privacy policy, think that the information it holds about you may need to be corrected, or you would like us to provide you with information about our services or services offered jointly with or on behalf of other organisations, please send an email via the 'Contact Us' link on this site or write to us at our registered office, as noted on this website.

Signed by: **Scott Fanning - Director**

A handwritten signature in black ink, appearing to read "Scott Fanning", is written over a light grey rectangular background.

Date: 14-06-21