



PRIVACY & DATA POLICY

May 2018

Turfdry (“we” or “us”) respect individuals’ privacy, and is committed to the safe and secure processing of personal data and compliance with applicable data protection law. We have implemented appropriate technical and organisational measures to protect your personal data against loss or unlawful access. The number of persons with access to your personal data is limited, and only individuals associated with Turfdry that need to process your personal data in accordance with the detailed purposes will have access to your personal data.

How we process your personal data

Fulfilling our obligations towards our clients – sending quotes, administrating orders, providing services, etc. – requires the processing of personal data.

How do we obtain your personal data?

We obtain personal data when you submit information via our website, contact the company via email, furnish our representatives with your business card, or when we obtain data from representatives of your company. Additionally, we hold some personal data that has been obtained via third parties along with the relevant consent permissions.

What categories of personal data do we process?

- Personal master data (key personal data)
- Contract data
- Key contract data (contractual/legal relationships, contractual or product interest)
- Network and device identification

What are the purposes of our data processing?

Fulfilling our contractual obligations towards our clients (eg: sending quotes, order administration, provision of services, invoicing, responding to service requests, etc.)

What is the legal basis for processing personal data?

It is within the legitimate interest of Turfdry and your company/organisation for your personal data to be processed for the above noted purposes. We use personal data for fulfilling our contractual obligations towards our clients. The privacy impact of this processing is low, as Turfdry contacts you in a professional capacity.

Who are the recipients of the personal data?

We will share your personal data with suppliers, business partners, and legal agents who carry out services on our behalf.

What is the retention period?

We will retain your data for as long as the business relationship with a company/organisation exists, and for as long as any individual's employment with said company/organisation subsists. We will retain and use your data during the applicable statutory limitation periods and as necessary to comply with our legal obligations, resolve disputes, and to enforce agreements.

Marketing / Prospecting

How do we obtain personal data?

The use of our website (eg: requesting a brochure) allows the placement of cookies. We receive personal data when supplied through business cards or in obtaining it from companies/organisations. We may also obtain personal data from third party data augmentation services, provided the relevant consent requirements have been met.

What are the categories of personal data we process?

- Personal master data (key personal data)
- Contract data
- Key contract data (contractual/legal relationships, contractual or product interest)
- Network and device identification

What are the purposes of our data processing?

Informing you via any means (including via email, telephone, text message, social media, post, or in person) about our products/services which we think may be of interest to you and your company/organisation, based on previous interactions and interest shown in Turfdry's services.

What is the legal basis for processing personal data?

Unless we explicitly request your consent to process your personal data, we rely on Turfdry and your company/organisation's legitimate interest to send you relevant marketing communications. The privacy impact of the processing individuals' personal data is low, as Turfdry contacts said individuals in a professional capacity. You can opt out of any processing for direct marketing purposes by clicking on the "unsubscribe" link within any of our marketing emails, and can object at any time to the processing of your personal data by contacting matthew@turfdry.com

Where you withdraw your consent or unsubscribe (as applicable), we will retain certain personal data to the extent that it is absolutely required on our "do not contact" list.

Who are the recipients of the personal data?

We will share your personal data with suppliers, business partners, and legal agents who carry out services on our behalf.

What is the retention period?

We will process your personal data unless you opt out of the process for direct marketing purposes.

Customer Testimonials

How do we obtain the personal data?

We obtain personal data through the submission of comments via post or email.

What are the categories of personal data we process?

Contact details, job role, and key personal data.

What are the purposes of this processing?

The processing is required for the purpose of providing comments to our client base in support or otherwise of our products/service.

What is the legal basis for this processing?

We have obtained your prior, informed consent to the processing.

Who are the recipients of this personal data?

Individuals who access any marketing channel, either from within or outside of Turfdry.

What is the retention period?

For as long as is necessary, unless you withdraw your consent to the processing.

Transfer of your personal data to third countries

Your personal data may be transferred to a country outside of EU/EAA such as the US, which offers similar levels of protection as within the EU/EAA. The transfer is based on the legal basis outlined above in *"How we process your personal data"*, and is for the purpose outlined in *"How we process your personal data"*. The transfer to these countries is based on the adequacy decision of the European Commission.

What are your rights?

You are entitled to know what data we are processing about you. You have the right to request access to your personal data and you can request that we provide a copy of such data to you. You are entitled to have incorrect personal data regarding you corrected, and in some cases you may request that we delete your personal data. You also have the right to object to certain processing of your personal data and request that the processing of your personal data be limited. Limitation or deletion of your personal data may result in Turfdry not being able to fulfil its commitments to you.

You also have the right to request data portability, where your personal data could be extracted in a machine-readable format and transferred to another controlled. Turfdry may not always be obliged to comply with a request from you for deletion, restriction, objection or data portability. Additional circumstances such as exercising the right of freedom of expression an information, compliance with a legal obligation which requires processing by EU or Member State law, or processing for establishment, exercise or defence of legal claims can justify further processing by Turfdry. Turfdry will assess the eligibility of your request and inform you about Turfdry decision and reasoning. Where you have given us your consent to process your personal data, you can withdraw your consent at any time and without justification. Where you withdraw your consent, certain personal data (only to the extent that it is absolutely required), will be retained on our “do not contact” list.

If you have questions about how we process Personal Data concerning you, please contact matthew@turfdry.com

Objections & Complaints

If you have any objections or complaints with the way in which we process your personal data, you have the right to lodge a complaint with the relevant data protection supervisory authority, where the applicable laws provide for such remedy.

Turfdry's Privacy Officer

Turfdry's Privacy Officer is Matthew Taylor, who can be contacted at: matthew@turfdry.com

Identity of the Data Controller

Turfdry Ltd, Redwood House, Woodville Road, Swadlincote, Derbyshire, DE11 7ET, English Company Registration 3021743 is the controller of your personal data.

Information Regarding Cookies

When you view Turfdry's website, or any other hyperlinked website, we may store some information on your local computer in the form of a "cookie", which allows us to adjust our website to better match your preferences. Cookies are also used to collect general usage and volume statistical information that does not include personal information.

A cookie is a small text file, which the website you are visiting saves on your local computer. Cookies are used by many websites to give visitors access to a range of various functions. The information contained in the cookie can be used to monitor a user's browsing behaviour.

There are two types of cookies: persistent cookies and session cookies. The former save a file for an extended period on your computer, and are used – for example – with functions that describe what information is new since you last visited the particular website. Session cookies, on the other hand, are stored temporarily in your computer's memory while you are visiting the website, and are used – for example – to determine what language you have chosen. Session cookies are not stored in your computer for an extended period, but are deleted when you close your browser.

Turfdry uses both types of cookies for the following purposes:

- a) to collect visitor statistics
- b) to remember user agent properties (eg: screen resolution, connection speed, etc.)

Third-Party Cookies

The use of cookies by our partners, affiliates, and service providers is not covered by our Privacy Policy. We do not have access to or control of these cookies.

Google Analytics

Turfdry's website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses cookies to help analyse the use of the website. The information generated by the cookie about your use of the website (including your IP address) might be sent to a Google server in the US and stored there. Under the authority of Turfdry, Google will use this information to evaluate your use of our website, compile reports on website activity, and provide other website activity and internet-related services for Turfdry. In addition, Google may also transfer this information to third parties if required by law or if third parties process the information on Google's behalf. To see details on what Google Analytics collects and how it is used please refer to <http://google.com/intl/en/analytics/privacyoverview.html>

You may refuse the use of cookies by changing the settings on your browser. This procedure will vary depending on what browser you are using, but the browser itself will likely contain instructions on how to refuse the use of cookies in a “help” or similar menu option. However, in refusing the use of cookies, certain functionality of particular websites may be missing or limited.

Web Beacons

Turfdry’s website contains electronic images known as web beacons (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyse the use of the website, and may be used in some of our emails to let us know which emails and links have been opened by recipients. This allows us to gauge the effectiveness of our customer communications and marketing campaigns. We do not tie the information gathered to our website’s users’ personally identifiable information.

Links to other websites

The Turfdry website features links to other websites, whose privacy practices may differ from those described in this Privacy Policy. If you submit personal information to any of those third party websites, your information is governed by their privacy policies. We encourage you to carefully read the Privacy Policy of any website you visit.

This policy was last amended on 22nd May 2018.

Signed 

Matthew Taylor – Assistant Manager

Date: 22nd May 2018