



YOUR PRIVACY AT STERLING

1. INTRODUCTION

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here but we want you to be fully informed about your rights, and how the Sterling Furniture Group uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

2. THE LEGAL BASES WE RELY ON

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you order an item from us for home delivery, we'll collect your address details to deliver your purchase, and in some cases may pass them to our courier.

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting The Sterling Furniture Group to law enforcement.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your purchase history to send you or make available personalised offers.

We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand, or develop new products/services.

We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

3. WHEN WE COLLECT YOUR PERSONAL DATA

- When you visit any of our websites, and use your account to buy products and services, or redeem vouchers from the Partnership on the phone, in a shop or online.
- When you make an online purchase and check out as a guest (in which case we just collect transaction-based data).
- When you create an account with us.
- When you purchase a product or service in store or by phone
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you ask one of our colleagues to email you information about a product or service.
- When you enter prize draws or competitions.
- When you book any kind of appointment with us or book to attend an event.
- When you choose to complete any surveys we send you.
- When you comment on or review our products and services. Any individual may access personal data related to them, including opinions. So if your comment or review includes information about the colleague who provided that service, it may be passed on to them if requested.
- When you fill in any forms. For example, if an accident happens in store, a colleague may collect your personal data.
- When you've given a third party permission to share with us the information they hold about you.
- We collect data from publicly available sources (such as Land Registry) when you have given your consent to share information or where the information is made public as a matter of law.
- When you use our car parks and shops which usually have CCTV systems operated for the security of both customers and Partners. These systems may record your image during your visit.
- When you submit a job application via email, post or via a 3rd party recruitment website.

4. HOW OUR FINANCE PROVIDERS USE YOUR PERSONAL DATA

When you apply for a product or service from one of our chosen finance providers, your data will be collected and used by them under the terms of their own separate privacy policies. Each finance provider must adhere to all GDPR regulations during and after your credit application. If you have any concerns regarding your data with any of our finance providers please contact them directly. If your data query or issue is not resolved to your satisfaction please contact Sterling's Marketing Preferences Team (details below) who will assist you.

5. THE KINDS OF PERSONAL DATA WE COLLECT

If you have a web account with us: your name, billing/delivery address, orders and receipts, email and telephone number.

- Details of your interactions with us through any department, in store, or online.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, voucher redemptions, brands you show interest in, web pages you visit and how and when you contact us.

- Copies of documents you provide to prove your age or identity where the law requires this. (including your passport and driver's licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.
- Details of your shopping preferences.

For example, which of our shops you prefer to visit and where you redeem any offers.

- Details of your visits to our websites and which site you came from to ours.
- Information gathered by the use of cookies in your web browser.
- Personal details which help us to recommend items of interest.
- We'll only ask for and use your personal data collected for recommending items of interest and to tailor your shopping experience with us. Of course, it's always your choice whether you share such details with us.
- Payment card information.
- Your comments and product reviews.
- Your image may be recorded on CCTV when you visit a shop or car park.
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

6. HOW WE USE YOUR PERSONAL DATA

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, if you've asked us to let you know when an item comes back into stock we can't do that if you've withdrawn your general consent to hear from us.

Here's how we'll use your personal data and why:

- To process any orders that you make by using our website or in store. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.

- To respond to your queries, refund requests and complaints. Handling the information you give us enables us to respond. We may also keep a record to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our customers, premises, assets and Partners from crime, we operate CCTV systems in our stores and car parks which record images for security. We do this on the basis of our legitimate business interests.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by **email, web, phone (SMS)** about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you relevant, personalised communications **by post** in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example product recalls notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or post. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To display the most interesting content to you on our websites we'll use data we hold about your browsing history. We do so on the basis of your consent for our website to place cookies or similar technology on your device.

For example, we might display a list of items you've recently looked at, or offer you recommendations based on your browsing history and any other data you've shared with us.

You are free to opt out of our online cookies at any time by updating your browser settings.

- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.

- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

For example, we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having.

- To comply with our contractual or legal obligations to share data with law enforcement.

For example, when a court order is submitted to share data with law enforcement agencies or a court of law.

- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

You are free to opt out of hearing from us with regards to surveys and feedback at any time.

- To build helpful picture of who you are and what you like, and to inform our business decisions, we'll combine data captured across our business and data from publicly-available lists. We'll do this on the basis of our legitimate business interest.

For example, by combining this data, this will help us personalise your experience and decide which products and services are most relevant for you. We also use anonymised data from customer purchase histories to identify trends which in turn will guide the products we display in stores.

- Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers or a fitter visiting your home). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request.

7. HOW WE PROTECT PERSONAL DATA

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites and apps using 'https' technology.

Access to your personal data is password-protected, and sensitive data (such as payment card information) is secured by SSL encryption.

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods:

Orders

When you place an order, we'll keep the personal data you give us so we can comply with our legal and contractual obligations.

Warranties

If your order included a warranty, the associated personal data will be kept until the end of the warranty period.

8. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, technicians visiting your home, for fraud management, to handle complaints, to help us personalise our offers to you and so on.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Direct marketing companies who help us manage our electronic communications with you.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites.
- Data insight companies to ensure your details are up to date and accurate.

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

To help personalise your journey through our website we currently use a number of the companies who will process your personal data as part of their contracts with us:

- Google
- Facebook
- Whoison (Parker software)
- Hotjar
- Sizmek

- Umbraco
- SLI
- Instagram
- Unbounce
- Adestra
- Pintrest
- Webrecruit

9. WHERE IS YOUR PERSONAL DATA PROCESSED?

Your data will be processed by Sterling and any necessary partners within the European Economic Area (EEA). In all normal circumstances your data will be processed within the UK.

10. WHAT RIGHTS DO YOU HAVE TO YOUR PERSONAL DATA?

An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact us to request to exercise these rights at any time as follows:

To ask for your information or to update your marketing preferences please contact Marketing preferences team, Sterling Furniture, 76 Moss Road, Tillicoultry, FK13 6NS or email: onlineteam@sterlingfurniture.co.uk.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

11. HOW CAN YOU STOP THE USE OF YOUR PERSONAL DATA FOR DIRECT MARKETING?

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails immediately.
- Write to **Sterling's Marketing Preferences Team, Sterling Furniture, 76 Moss Road, Tillicoultry, FK13 6NS**
- Call us on, **0845 543 0469**, Monday to Friday 9:30am to 5pm

Please note that you may continue to receive postal communications for a short period after changing your preferences while our systems are fully updated.

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