



Introduction

G R Millward Ltd ("We") are committed to protecting and respecting your privacy.

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

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

G R Millward Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are G R Millward Ltd, Unit 5, Newhall Road Works, Newhall Rd, Sheffield S9 2QL Tel: +44 [0]114 2431335. For all data matters contact our data representative at data@grmillward.co.uk

The purpose(s) of processing your personal data

We use your personal data for the following purposes:



- Fulfilling your orders for products or services and related activities, such as delivery, customer service, account management, support and training, product update and safety related notices, and to provide other services related to your purchase.
- Managing our contractual obligations and your ongoing relationship with us, including interacting with you, informing you about our products or services and other activities.
- Ensuring the security of our websites, networks and systems, and premises, as well as protecting us against fraud.
- Managing our everyday business needs, such as payment processing and financial account management, product development, contract management, website administration, fulfillment, corporate governance, audit, reporting and legal compliance.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Contact Information that allows us to communicate with you, such as your name, job title, age and prefix, username, mailing address, telephone numbers, email address or other addresses that allow us to send you messages, company information and registration information you provide on our website.
- Relationship Information that helps us do business with you, such as the types of products and services that may interest you, contact and product preferences, languages, creditworthiness and marketing preferences.
- Transactional information about how you interact with us, including purchases, enquiries, customer account information, order and contract information, delivery details, billing and financial data, details for taxes, transaction and correspondence history, and information about how you use and interact with our websites

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

Consent of the data subject	Contact data@grmillward.co.uk for a data consent form
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Contact admin@grmillward.co.uk for an account form

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and may be shared only with the following:

- External Third Parties Service:
 - Sales Service Provision (acting as processors) based in the United Kingdom who provide delivery, document certification, IT and administration services.



- Professional advisers (acting as processors) including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, legal, banking, insurance, accounting and auditing services.
- HM Revenue & Customs, regulators and other authorities (acting as processors) based in the United Kingdom who require reporting for processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all 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. How long do we keep your personal data?

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers including contact, identity, financial and transaction data for six years after they cease being customers for tax purposes.

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

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;



- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Automated Decision Making

We do not use any form of automated decision making in our business.

11. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

12. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

13. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our data representative at data@grmillward.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.