













Privacy Policy

Our contact details:

Name: Dalen Ltd

Address: Valepits Rd, Garrett's Green, Birmingham B33 0TD

Phone Number: 0121 783 3838

E-mail: gdpr@dalen.co.uk

We are committed to protecting your privacy. We will use your personal information in accordance with all applicable laws and regulations that relate to data protection and privacy, including the EU and UK General Data Protection Regulations ("GDPR").

This policy is to detail:

- the type of personal information we collect
- how we get the personal information and why we have it
- how we will use it
- how long we will keep it
- who else will see it
- your rights in relation to your personal information that we hold, including your rights to change, delete and see your personal information.
- how you can contact us

The type of personal information we collect:

We currently collect and process the following information;

- Your first name
- Your last name
- Your email address
- Your postal address
- Your telephone number(s)
- Your current employer
- Your job title
- Your profession
- Information concerning your marketing preferences
- Your username and password for our website
- Anonymous website analytic data

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- Your vehicle registration (for visits to our offices)
- Your photograph (for visits to our offices)
- Your employment history
- Your qualifications (for prospective employees, and those employed by Dalen)
- For those employed by Dalen, relevant information for your continued employment such as, but not limited to – proof of right to work, next of kin, DBS check result, health related data as shared by you to us.

How we get the personal information and why we have it Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You are employed / sub contracted through Dalen
- You are enquiring about a job
- You are inquiring about our products / service
- You are purchasing our goods / services

We also receive personal information indirectly, from the following sources:

- At time of purchase from Dalen.
- Information contained in, and records of communications between us, including recordings of telephone calls when you contact us, and messages sent using email, instant messaging applications, or other third-party platforms
- CCTV footage in which you feature when you visit our premises (and, in the event that you have an accident while on our premises that you bring to our attention, we may record details of that accident and any injury you suffer in the relevant accident logbook)
- Information that you provide to us by using our Digital Services, including any photos you have uploaded via our Digital Services or third-party platforms (such as when you sign in during a visit, share content on social media, write a review, or ask us a question)







How we will use it

We have set out below the purposes for which we use your personal information:

Contractual necessity

We may use your personal information in order to meet our obligations under contract between you and Dalen. For example, we will use your details and delivery address to process and fulfil your order(s), and to communicate with you about your order for a service or product.

Legitimate interests

We use your personal information to:

- Remind you of your partial order and so that you can (if you wish) complete the order. We may use any contact information you have provided us to follow up on your order.
- Contact you so that we can ask you to provide feedback on the product or service you have ordered.
- Provide you with information about products and services, including offers, vouchers, gifts, deals, and information about products and events relevant to you based on your purchase history.
- Send you this information. In some cases (such as where we are required to do so by law) we will also ask for your consent before sending you this information (in which case we rely on consent and not legitimate interests as our legal basis).
- Review your past purchases and viewing history on our Digital Services to provide you with special offers or to tailor your experience online.
- Help us review, develop and improve the products and services
 we offer. For example, calls to our offices are monitored and
 recorded for quality control and training purposes. If you raise a
 query (for example about a product or about our service) while
 we still hold a recording of your telephone call, and we can
 investigate or answer your query by referring back to this call,
 we may do so. This may mean that your call recording will be
 held until your query has been resolved. We may also send you
 market research requests via email (which you can opt out of via
 that email).

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- Protect against unlawful activities. In some cases, we may also be under a legal obligation to disclose your personal information (for example, to law enforcement agencies), to carry out security checks to protect against fraudulent transactions and to prevent and detect criminal activity.
- Address any claims you make against us. In some cases, we may also be under a legal obligation to disclose your personal information (for example, in connection with legal proceedings). For example, we may share details of our accident logs and CCTV footage with our third-party claim handlers and insurers in connection with any claim made or reasonably likely to be made against us. Also, where the personal information constitutes special categories of personal data (for instance, health information), we will process the information on the basis that it is necessary for the establishment, exercise or defence of legal claims (as the case may be).

Compliance with legal obligation

We process your personal information in order for us to comply with our legal obligations (including in connection with a court order).

Keeping your data secure

We will use technical and organisational measures to safeguard your data, for example, storing your data on secure servers, using encryption as required to prevent unauthorised access. Our systems are protected by usernames, passwords, and multi factor authentication; and hard copies of data are locked away securely.

How long do we keep your personal information?

We are required by law to keep your personal information only for as long as is necessary for the purposes for which we are using it. The period for which we keep your personal information will be determined by a number of criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations.







Who else may see it:

We may share this information with:

- Delivery companies for the purposes of delivery of contract.
- Subcontract suppliers for the purposes of delivery of contract.
- Suppliers to aid with resolution of warranty claims, as required to perform our contract with you.
- Subcontract providers of health services, to perform our legal obligations to employees.
- HMRC, pension providers, and other employee benefit providers as required to perform our contractual and legal obligations to employees.
- Training service providers (employees only)
- Cloud software providers for business systems, including Salesforce, Google, and other such providers.

Your data protection rights

Dalen would like to make sure you are fully aware of your data protection rights. Every individual is entitled to the following:

<u>Right of access</u> - You have the right to ask us for copies of your personal information.

<u>Right to rectification</u> - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

<u>Right to erasure</u> - You have the right to ask us to erase your personal information in certain circumstances; for e.g., where there is no good reason for us to continue to hold that data.

<u>Right to restriction of processing</u> - You have the right to ask us to restrict the processing of your personal information in certain circumstances; for e.g., Temporarily stop using your information if you are questioning our right to use that data and in other circumstances where that right is applicable.







Right to object to processing - You have the right to object to the processing of your personal information in certain circumstances. Unless we can demonstrate a valid reason, we need to continue to hold that data e.g., to support a product warranty.

<u>Right to data portability</u> - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

How do we use cookies?

We use cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in.
- Understanding how you use our website.

How to manage cookies

You can set your browser not to accept cookies, as well as remove existing cookies from your browser. However, some features of the website may not function as a result.

Privacy policy of other websites

Our website contains links to other third-party sites. Our privacy policy applies only to our website, and so if you follow a link to a third-party site, you should read their privacy policy.

Changes to our privacy policy

Our privacy policy is kept under regular review, and any updates are applied to this page. This privacy policy was last updated on 7th November 2023.

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How to contact us

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at gdpr@dalen.co.uk if you wish to make a request.

You also have the right to make a complaint to the Information Commissioner's Office if you are not happy with how we have handled your personal information.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to our Data Protection Officer at gdpr@dalen.co.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

November 7th 2023

Signed by:

Adam Beardmore

Adam Beardmore Managing Director