



Privacy & Cookies Policy for Suppliers & Customers

Eastbrook Company is a privately owned wholesaler and distributor of a large range of bathroom products. Managed by the Partners, the company has its head office and single depot trade outlet in the UK. In this policy the terms 'we', 'us' and 'our' refer to Eastbrook Company or the Partners, either separately or collectively, as appropriate.

Eastbrook takes your privacy seriously. We are committed to protecting the privacy of our customers, suppliers and end users of our products, to being transparent about how we collect and use your data, and to meeting our data protection obligations. Eastbrook is responsible as the 'Controller' of that personal information for the purposes of the General Data Protection Regulations ('GDPR'). Eastbrook also acts as a 'Data Processor' on behalf of our customers who supply and install our products with the end user. We have a separate Privacy policy relating to how we collect, store, use and retain end user personal data provided by our customers which can be found at www.eastbrooktrade.com/aboutus/policiesandprocedures

Eastbrook is registered on the Information Commissioner's Data Protection Register under number ZA432290.

What personal information does Eastbrook collect and how does it do so?

Eastbrook may collect personal information:

- when you provide it to us by visiting & ordering via our website (<http://www.eastbrooktrade.com/>);
- joining our mailing list(s);
- when you complete a Credit Account application form;
- when you place a purchase order with us;
- when you supply an order and/or invoice;
- corresponding with us by telephone, email or otherwise;
- from publicly accessible sources, e.g. LinkedIn, Twitter, Facebook, Companies House etc;
- in relation to end user's personal data, when an After Sales Enquiry form is completed

Eastbrook may collect and process a range of personal and financial information. Such information may include:

- your name and contact details, including email address and telephone number (work and mobile);
- Business bank accounts when supplied by you;

- any other information that you choose to send us.

Eastbrook's website uses cookies. These are small text files that are placed on your computer or mobile device when you visit a website. Eastbrook's website uses "persistent cookies". Persistent cookies expire after a prescribed period of time.

Cookies can be disabled by changing the settings on your browser.

We may use Google Analytics to provide us with information about the use of Eastbrook's website, including:

- password and standard usage data about requests for pages on Eastbrook's website;
- the requesting computer's operating system, browser type, screen size and colour depth;
- the requesting computer's IP address and any domain name associated with it;
- the length of any visit and the number of page views;
- information relating to any transactions carried out between you and us on or in relation to Eastbrook's website, including information relating to any purchases you make of our products or services.
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Why does Eastbrook process personal information?

We may use your personal information:

- to comply with our contractual obligations;
- to keep you up to date with the range of products and services that Eastbrook provides;
- to send you general commercial communications;
- to send you email notifications which you have specifically requested;
- to send you marketing communications relating to our business which we think may be of interest to you;
- to gather statistical, marketing and strategic development information;
- for recruitment purposes;
- to deal with enquiries and complaints relating to Eastbrook's products, services and Warranties on products supplied.

We can only use your personal information if we have a proper reason for doing so. This is likely to arise as a result of our contractual obligations but may also be because there is a legitimate business reason for using it, for example to send you information about new products or because you have given us explicit consent to use your personal information. We will also use your personal information to comply with our legal and regulatory obligations.

Who has access to your personal information?

Your personal information may be shared internally with our employees, and on occasions with manufacturers to deal with an End User query or complaint but only as is reasonably necessary for the purposes set out in this privacy policy.

In addition, we may disclose information about you:

- as required by law;
- in connection with any current or prospective legal proceedings;
- in order to establish, exercise or defend our legal rights;
- to the purchaser of any business or asset which we are (or are contemplating) selling.

In the normal course of events and unless, for example, required to by law, Eastbrook will not transfer your data to countries outside the European Economic Area except in the course of a legal transaction where it is necessary to do so.

How does Eastbrook protect personal information?

Eastbrook takes the security of your personal information seriously. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this privacy policy. Eastbrook has internal policies and controls in place intended to ensure that your personal information is not lost, accidentally destroyed, misused or disclosed, and is not accessed other than as set out above. We store all data you provide on our secure (password and firewall protected) servers.

Where Eastbrook engages third parties to process personal information on its behalf, these third parties do so on the basis of written instructions, under a duty of confidentiality. Any third parties processing personal information on behalf of Eastbrook are obliged to implement appropriate technical and organisational measures to ensure the security of that information.

We provide training to all our staff to remind them of their obligations. Our policies and procedures are audited and reviewed regularly.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Eastbrook to change incorrect or incomplete data;
- require Eastbrook to delete or stop processing your data, for example where such data are no longer necessary for the purposes of processing;
- object to the processing of your data where Eastbrook is relying on its legitimate interests as the legal ground for processing.

If you believe that Eastbrook has not complied with your data protection rights, you can complain to the Information Commissioner's Office (ICO): <https://ico.org.uk/>

Retention policy

We only retain your personal information for as long as necessary for the reasonable and legitimate conduct of our business. After this period if there is no on-going relationship your personal information will either be stored in our secure archives system to which there is very limited access.

Policy amendment

We may update this privacy policy from time to time. Any changes we may make to this policy will be posted on our website and, where appropriate, notified to you by email. This policy was last updated on 30 May 2018.

Contact us

If you have any questions about this privacy policy or would like to exercise your rights, please contact Emma Ricketts, Privacy Manager, by email (gdpr@eastbrookco.com), telephone 01452 317800 or post Eastbrook Company, Eastbrook Road, Gloucester, GL4 3DB