PRIVACY NOTICE

Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

Responsibilities

The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to FILL REFILL CO T/as Ideal Manufacturing collecting/processing their personal data.

All Employees/Staff of Fill Refill Co who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

Privacy notice

Who are we?

FILL REFILL CO T/as Ideal Manufacturing is an independent, family-run, British laundry, hygiene and cleaning product manufacturer, specialising in high performance, eco responsible professional laundry and wet cleaning products.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- <u>hello@fillrefill.co</u>
- phill@fillrefill.co
- 01933 681616

The personal data we would like to [collect from] you is:

Personal data type:	Source obtained from if it has not been collected directly from you.
Business name and address	Public domains
Contact name and address	Public domains
Products and services	Public domains
Company Financials	Companies house and appointed credit agency

The personal data we collect will be used for the following purposes:

- Communication
- Credit control and account management

Our legal basis for processing personal data:

- Customer support
- Customer services point of contact
- Safety regulations
- Quality assurance systems in line with ISO 9001 and ISO 14001
- Tracking and traceability

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To provide better performing products for our customers
- To reduce cost of purchase for our customers
- To ensure account credit controls are in line with finance credit ratings

The special categories of personal data concerned are:

- Safety regulations
- Quality assurance systems in line with ISO 9001 and ISO 14001
- Warranty of chemical products for 12 months

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Fill Refill Co to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting hello@fillrefill.co

Disclosure

We will not pass on your personal data to third parties without first obtaining your consent.

Retention period

We will store the personal data for a minimum of 12 months or indefinitely whilst an active customer.

Your rights

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Fill Refill Co refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Fill Refill Co or how your complaint has been handled, you have the right to lodge a complaint directly with our data protection representative.

The details for each of these contacts are:

phill@fillrefill.co

Fill Refill Co Atlas House Burton Road Finedon Northamptonshire NN9 5HX

01933 681616

Privacy statement

Read more about how and why we use your data here www.fillrefill.co/privacy-policy

Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

Read more about cookies and why we use your data here www.fillrefill.co/privacy-policy

Why do we need to collect and store personal data?

In order for us to provide you with a service / our products we need to collect personal data for correspondence. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes we would contact you for additional consent.

How will Fill Refill Co use the personal data it collects about me?

We will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. We are required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific public business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Fill Refill Co contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

At your request, we can confirm what information we hold about you and how it is processed. If we do hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.

- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Fill Refill Co or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

• Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

We accept the following forms of ID when information on your personal data is requested: Passport, driving licence, utility bill (from last 3 months).

Contact details of the Data Protection Officer / GDPR Owner:

phill@fillrefill.co Fill Refill Co Atlas House Burton Road Finedon Northamptonshire NN9 5HX

01933 681616