



## CUSTOMER AND SUPPLIER PRIVACY POLICY

We take our responsibility for holding and using your data seriously and are committed to respecting and safeguarding your privacy and the personal data that you share with us.

We collect your personal data when you interact with us, for example when you:

- visit our websites
- buy our products or services
- contact us with an enquiry
- supply goods or services to us

This policy details the personal data that we collect about you, why and how we use it, your rights regarding it and how you can update it.

We may make changes to this policy from time to time, so it's worth checking back occasionally to make sure you're happy with those changes. Where we make significant changes to this policy or how we use your personal data, we will take additional steps to draw this to your attention.

Please ensure that you read and understand this policy. Where you interact with us or use one of our websites, we assume that you have done so.

You should note that you have certain rights under this policy, including to object to certain uses of your personal data. Further details are set out in the relevant parts of the policy.

### Who are we?

In this policy, whenever you see the words 'we', 'us' or 'our', it refers to the Brett Group company that you are interacting with. This company will be the data controller responsible for holding and using your personal data.

The identity of the specific Brett Group company will depend upon your interaction with us.

Details of each Brett Group company are as follows:

Company	Registration number	Registered Office
Robert Brett & Sons Limited	00227266	Robert Brett House. Ashford Road, Canterbury, CT4 7PP
Brett Trading Limited	1528676	As above
Brett Aggregates Limited	316788	As above
Brett Concrete Limited	641279	As above

Brett Landscaping Limited, trading as Brett Landscaping and Building Products	342312	As above
Britannia Aggregates Limited	2304376	As above
Granite Products (CI) Limited	6500051	St Peters Valley, Jersey CI, JE3 7EY

### The data we collect about you

Personal data means any information about an individual from which that person can be identified. Details of data that we typically collect are set out in the appendix to this policy.

### How we use your data

We only process your personal data where we have a legal basis to do so. In almost all cases the legal basis will be so we can perform our contract with you to provide products and services or manage our supply chain.

A description of the ways we plan to use your personal data and which of the legal bases we rely on to do so are set out in the appendix to this policy.

### How long we keep it

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

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, regulatory, tax or accounting requirements. Details of retention periods for different aspects of your personal data are set out in the appendix to this policy.

### How safe is your personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place an IT Security and Data Incident Response Plan to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Who will be using it?**

We never sell your personal data to any third parties for any reason.

We may share your data with selected third-party service providers, agencies and subcontractors who do work on our behalf. Where this is necessary, we will only pass over the information necessary to carry out the specific service and the third parties are under contract to keep your information safe and secure and not to disclose it to anyone or use it for their own marketing purposes.

If you make a purchase from us by bank card, your payment will be processed by a third-party payment processor who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding the processing of payment transactions, please contact us.

You will find some links in the Brett Group websites to third party websites. Please note that we are not responsible for the privacy policies or content on such third party websites.

### **Do we transfer your data outside the UK?**

We may transfer your personal data outside the UK. If we do, you can expect a similar degree of protection in respect of your personal data and we will ensure that any relevant countries have been deemed to provide an adequate level of protection for personal data.

### **How can you update your details?**

We want to make sure that our information is as accurate as possible. If the data we hold about you is incorrect or out-of-date, and you'd like us to make any changes, you can contact us as set out below.

### **How do you make a complaint**

If you have any queries or complaints about our collection, use or storage of your personal data, please contact us as set out below. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data.

You also have the right to lodge a complaint about our processing of your personal data with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

### **What are your rights in connection with your personal data**

Under certain circumstances, by law you have the right to request access to, verify, correct or request deletion of your personal data or object to the processing of your personal data. If you wish to make such a request, please contact us as set out below and we will process such request in accordance with our Data Request Policy.

**If you have any questions or need to contact us about this policy please contact our General Counsel, Susan Kitchin by e mail on [susan.kitchin@brett.co.uk](mailto:susan.kitchin@brett.co.uk), or by post to Robert Brett House, Ashford Road, Canterbury, Kent, CT4 7PP.**

## APPENDIX

Type of personal data	Lawful basis for processing	Retention Period
<p><i>Identity and contact information:</i> includes your name, address, telephone number and email address as provided by you when you contact us, ask for a quotation, place an order with us or supply us with goods and services or quotations</p>	<p>Performance of a contract with you</p>	<p>Up to seven years from last use</p>
<p><i>Transaction data:</i> includes details of products and services you have purchased from us or supplied to us</p>	<p>Performance of a contract with you</p>	<p>Six years</p>
<p><i>Financial data for products and services purchased from us:</i> includes bank account and payment card details</p>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us)</li> </ul>	<p>Not retained</p>
<p><i>Financial data for products and services supplied to us:</i> includes bank account details</p>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to pay debts due from us)</li> </ul>	<p>Retained whilst trading is active – deleted within two months of trading ceasing</p>
<p><i>Customer complaints</i></p>	<p>Necessary for our legitimate interest (processing your complaint)</p>	<p>Six years</p>

<p><i>Technical data:</i> includes the date and time, the originating IP address, the domain name, the type of browser and operating system used (if provided by the browser), the URL of the referring page (if provided by the browser), the object requested and the completion status of the requested information - please see our Cookies Policy for further information</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)</p>	<p>Anonymised</p>
<p><i>Marketing information:</i> if you register to receive promotional and marketing information from any part of the Brett Group we keep a record of this choice and your contact details</p>	<p>Consent</p>	<p>Until you unsubscribe - you can do this at any time by contacting the relevant business – see the Brett website for contact details.</p>
<p><i>Accident data</i> - if you are involved in an accident at one of our premises or sites, we will ask you to complete an accident form providing us with contact information and details of your accident</p>	<p>Necessary to comply with our legal obligation regarding the safety of our sites and (if necessary) to follow-up with you in relation to the accident or use the information in relation to a legal claim against us</p>	<p>Forty years</p>
<p><i>CCTV footage</i> - we collect CCTV footage at premises and sites where we maintain CCTV systems for security purposes - please ask to see our CCTV</p>	<p>Necessary for our legitimate interests (such as to prevent crime, to protect buildings and assets</p>	<p>Up to 62 days, unless an incident has been recorded, when such data will be retained for as long as is required for such incident to be investigated</p>

<p>Policy for further information - by emailing General Counsel, Susan Kitchin on <a href="mailto:susan.kitchin@brett.co.uk">susan.kitchin@brett.co.uk</a> for a copy.</p>	<p>from damage, disruption, vandalism and other crime and for the personal safety of staff, visitors and other members of the public)</p>	
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