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1 Who are we?

IBP Global Trading Ltd is a UK-headquartered organisation with operations across the world, manufacturing and distributing a wide range of plumbing fittings.

You can contact our Data Protection Officer as follows:

Johnty Mongan

Global House, 95 Vantage Point

The Pensnett Estate

Kingswinford DY6 7FT

dpouk@ibpgroup.com

2 The personal data we may need to collect from you

2.1 Types of data

We use your personal data in different ways according to the products and services we provide to you. Typically, this information will be provided by you, but we may obtain it from a third party, in which case we will make this clear at the time when we collect it.

Here is a list of the data we may need to collect from you:

Personal data type:	Source if not from you
Contact (personal or business- name, address and how to contact you, including social media)	
Contractual (details about the products or services we provide to you or you to us)	
Transactional (payments from and to you, including card details)	
Financial (business information)	Credit agency, Companies House, Debt collection agencies
Communications (letters, emails, summary of conversations and meetings)	
Locational (cookies, IP address)	Dotmailer, Google Analytics (anonymized data)
Open data and public records (information about you that is in the public domain)	Companies House, company websites or other relevant media (including social media)
Marketing (preferences)	
Consents (permissions you give us including about how to contact you)	

2.2 Purposes your data will be used for

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

- To provide products and services within contractual scope
- To market new products
- To assess creditworthiness when opening a credit account
- To run credit and fraud prevention checks

- To collect unpaid debt
- To satisfy statutory requirements (for instance, invoices need to be kept for VAT purposes)

2.3 Our legal basis for processing

Our legal basis for processing for the personal data:

- Contract- to enable us to fulfil a contract we have with you
- Legitimate interest – we will tell you which commercial or business interest if we rely on this to process your data
- Consent where applicable- where you have given us your consent to use your data in a certain way and for a given purpose
- Legal obligation- to satisfy statutory requirements

2.4 Special Category data

We will not normally collect special category data from you. If there is a special requirement to do so, we will always tell you why, how the information will be used and we will seek consent from you.

3 Consent

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

Explicit consent is also required for IBP Global Trading Ltd to process special category personal data. We will not normally process special category data but if there was a requirement to do so, we will always tell you why and how the information will be used.

You may withdraw consent at any time by putting your request in writing to our DPO as per contact details in clause 1.

4 Sharing your data

4.1 Group companies

IBP Global Trading Ltd is a global organization and as such it is likely we will share your data with other companies within the Group, some of which may be located outside of the EEA- see below:

- Conex Universal Ltd (UK)
- Masterflow Products Ltd (UK)
- IBP Italia SRL (Italy)
- International Building Products GmbH (Germany)
- IBP Atcosa SL (Spain)
- IBP Instalittings SP zoo (Poland)
- Conex Universal DMCC Branch (Dubai)
- IBP Group LLC (US)

We have a group-wide arrangement (Intra-Group Data Transfer agreement) to ensure that your personal information is handled consistently, properly and safely. You can ask for a copy of this agreement by email from our DPO (see contact details in clause 1).

4.2 Third party providers

We may also use other service providers to handle your personal data on our behalf to do the following

- Help us provide services to you
- Provide marketing, IT support and services
- Process Payment transactions
- Carry out credit checks and detect fraud
- Collect unpaid debt
- Understand your interactions with us and improve our service to you

The company as the controller of the social media account page, having created such a page, grants the social media platform (whether it be Facebook, Twitter, LinkedIn, YouTube or Instagram) the possibility to record cookies on this computer or any other device of a person who is visiting the social media account page. Opening the social media account page involves taking certain actions by the controller which consist in that parameters within the scope of its activity management and promotion are established. This, in turn, affects personal data processing conducted with regard to statistics being compiled on the basis of the number of the social media account page visitors.

The filters provided by social media platforms enable the controller to determine the statistics criteria and thus set goals and principles of data processing. The statistics concerning users are transferred in an anonymous form to the fan page controller exclusively. This, however, does not alter the fact that compiling the statistics involves prior collection through cookies installed by the social media platforms on computers or any other devices of the users who visit this page as well as it entails personal data processing for statistical purposes. For more information concerning social media platforms' data processing, please refer to their individual privacy policy:

<http://www.facebook.com/about/privacy/>

<https://twitter.com/privacy>

<https://www.linkedin.com/legal/privacy-policy>

<https://policies.google.com/privacy?hl=en-GB&gl=uk>

<https://help.instagram.com/519522125107875>

4.3 Transfers outside of the EEA

As we are an international group, your personal data may at times be transferred outside of the EEA for customer support, IT, marketing or operational purposes. Any such transfers between the Group companies will be covered by the Intra Group Data Transfer agreement.

If we need to transfer your data outside of the EEA to a third-party organization, we will only do so where we have contracts in place to safeguard your data (copies of these contracts are available on request)

5 Retention periods

5.1 We will keep your personal data for as long as you are a customer or supplier of IBP Global Trading Ltd (or any Group company) to enable us to perform our contractual duties, with a maximum of 11 years after you cease trading with us.

5.2 We may however retain information for longer than 11 years for the following reasons:

- there are legal or regulatory obligations to do so in the UK or any country where the Group operates
- training certification driving warranty periods (training records will be kept indefinitely or until you request to delete)
- in the event of a claim

6 Your rights as a data subject

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

- Right of transparent communication
- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restriction of processing
- Obligation to notify recipients
- Right to data portability
- Right to object
- Right to not be subject to automatic decision making

Your rights remain unaffected when your data has been shared with a third-party.

7 Complaints

Any queries or comments about this privacy notice, or any concerns that your data may not be processed properly should in the first instance be addressed to our Data Protection Office.

Name: Johnty Mongan

Email: dpouk@ibpgroup.com

If you feel your concerns have not been addressed appropriately, you can contact the Information Commissioner Office.

<https://ico.org.uk/>

8 Policy owner

This policy is owned and maintained by the DPO.

9 Policy review date

Date last reviewed: 16/08/19