

INTRODUCTION

Welcome to the Eden Interior Solutions Limited (“Eden’s”) privacy notice.

Eden respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Eden collects and processes your personal data through your use of this website, including any data you may provide through this website when you contact us, sign up to any newsletter, or purchase a product or service. It is our aim to ensure that your personal data is well protected.

This privacy notice applies to the personal data of our Website Users, Candidates, Clients, Suppliers, and other people whom we may contact in the interests of developing our business. If you are a member of Eden staff, please refer to the Privacy Notice for Employees and Workers, however this privacy notice does apply to the emergency contacts of our staff.

The Eden website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or processing notice we may provide on specific occasions when we are collecting or processing personal data about you, for example with our Terms and Conditions of Business or any processing agreement, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Eden is the **controller** and responsible for your personal data as well as a data processor for the purposes of the GDPR (collectively referred to as “we”, “us” or “our” in this privacy notice).

Questions, comments and requests about this privacy notice are welcomed, including any requests to exercise your legal rights, and should be addressed to the data privacy officer using the details set out below.

CONTACT DETAILS

Full name of legal entity: Eden Interior Solutions Ltd

Name of data privacy officer: Nicola Kellett

Email address: nicola@thevfgroup.com

Postal address:

Eden Interior Solutions Ltd

1 Clerkenwell Green

London

EC1R 0DE

Telephone number: 020 7138 3271

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to

deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was updated on 25th May 2018.

We work hard to keep your personal data secure which includes regularly reviewing it. We may therefore update this privacy policy from time-to-time by posting a new version on our website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by emailing us at nicola@thevfgroup.com

THIRD-PARTY LINKS

Our website currently has links to third-party websites, plug-ins and applications. Please be advised that clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. TYPE OF DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified whether directly or indirectly. It does not include data where the identity has been removed (anonymous data). It includes, for example, name, address, date of birth but also what you do for a job and who you work for and anything else that can be used to identify you as an individual.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes name, title, gender, postal address, postcode, email address, telephone numbers including mobile phones, employment status, marital status, immigration status, date of birth, place of birth, and nationality.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address used to connect your computer to the Internet and information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products or services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Profile Data** includes your purchases or orders made by you, feedback and any survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or purchasing a specific service. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, accountants, marketing agencies, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

We do not collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, telephone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - send us an online enquiry through our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns by using Google Analytics as an example. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy <https://eden-interiors.com/cookie-policy/> for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:

(a) analytics providers such as Google based outside the EU;

(b) search information providers.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services including credit reference agencies.
- Identity and Contact Data from publicly available sources such as client websites, supplier websites, recruitment agency websites, professional membership body websites, Companies House, the Land Registry and the Electoral Register based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we **need to perform the contract** we are about to enter into or have entered into with you and to provide you with the information, products and services that you request from us.
- Where it is **necessary for our legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we **need to comply with a legal or regulatory obligation**.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing us at nicola@thevfgroup.com

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at nicola@thevfgroup.com

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please email us at nicola@thevfgroup.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been

set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To register you as a new client and to manage your relationship with us and to manage your contract with us. Enquiries may come to us from you through our website or via email, by telephone or in person.</p>	<p>(a) Identity (b) Contact</p>	<p>Performance of our contract with you necessary to provide the goods and services and to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly.</p>
<p>Send you general (non-marketing) commercial communications.</p>	<p>(a) Identity (b) Contact</p>	<p>(a) Performance of a contract with you including contacting you by post, email or telephone, to help us perform the services, respond to any enquiries or complaints, ship deliveries to clients, visit client sites, and other matters necessary to help us carry out the terms of the contract to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly.</p>
<p>Candidates: In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, age, contact details, education details, employment history, emergency contacts, immigration status, financial information (where we need to carry out financial background checks), and national insurance number (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and</p>	<p>(a) Identity (b) Contact (c) Financial</p>	<p>(a) Performance of an employment contract with you. (b) Necessary to comply with a legal obligation – to check your identity and immigration status and to set you up as an employee with HMRC</p>

<p>requirements, we may also collect information related to your health. We have a specific Candidate Privacy Notice for candidates which is available on request.</p>		
<p>In order to provide candidates with suitable employment opportunities safely and securely and to provide for every eventuality for them and our employees we need some basic background information. To help you find employment or other work roles that might be suitable for you. We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our candidates or employees.</p>	<p>(a) Identity (b) Contact</p>	<p>(a) Performance of a contract with employees.</p>
<p>We need some information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us). This information is collected during the course of our work with you.</p>	<p>(a) Identity (b) Contact (c) Financial</p>	<p>(a) Performance of a contract with you</p>
<p>Information relating to any transactions carried out between you and us including information relating to any purchases you make of our goods or services. Issue invoices, collect and recover</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to issue invoices and to recover debts due to us – we may in this instance have to forward on your data to a third-party debt collector, solicitor or direct access barrister.</p>

<p>money owed to us.</p>	<p>(e) Marketing and Communications</p>	<p>If this happens you will receive a notification from us before we do so. Any receipt or transfer of funds will be via recognised secure payment systems. We will securely destroy any financial information once used and no longer needed other than required by law.</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy.</p> <p>(b) Asking you to leave a review or take a survey.</p> <p>(c) To send you email notifications which you have specifically requested.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services and manage any enquiries and complaints). (c) Consent. We will seek your explicit consent in writing if we have not already received your consent to opt in to any marketing purpose and for any new marketing purpose. You may withdraw consent previously given at any time by email or letter or similar method used to obtain your consent.</p>
<p>To enable you to partake in a prize draw, competition or complete a survey.</p> <p>Information that you provide to promote the Company on its own website and its marketing activities, and for the purpose of subscribing to our website services, email notifications and/or newsletters.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business).</p>
<p>We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use</p>	<p>(a) Identity (b) Contact (c) Technical (d) Profile</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (for managing our website, running our business and provision of administration and services, to prevent fraud, communicate with you about any</p>

<p>our website, the frequency with which you access our website, and the times that our website is most popular. It may also include your IP address, geographical location, browser type, referral source, length of visit and number of page views.</p> <p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). We need this information to enable your use of the services available on the website. Deal with enquiries and complaints made by or about you relating to the website. To the extent that you access our website we will also collect certain data from you.</p>	<p>(e) Usage</p>	<p>complaints or enquiries you may have, and in the context of a business reorganisation).</p>
<p>To use data analytics to improve our website, products/services, marketing, client relationships and experiences.</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you and Improve your browsing experience by personalising the website. To the extent that you access our website we will also collect certain data from you.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy).</p>

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We currently have no intention of sharing data with third parties for marketing purposes however if that changes we will get your express opt-in consent before we share your personal data with any company outside Eden for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at nicola@thevfgroup.com.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

COOKIES

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not work properly. For more information about the cookies we use, please see <https://eden-interiors.com/cookie-policy/>. For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us at nicola@thevfgroup.com

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the

above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above and with business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you and credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

- External Third Parties as set out below.
- Specific third parties such as HMRC.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

EXTERNAL THIRD PARTIES

- Service providers acting as processors based in the UK who provide marketing services (Rapport Ltd).
- Service providers acting as processors based in the UK who provide our operations system (MoveMan).
- Service providers acting as processors based in the UK who provide our IT support (Our IT).
- Banking, legal, insurance, accounting and auditing services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Fraud prevention agencies, credit reference agencies, HM Courts & Tribunals Service.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**) to be used by any other party we do however partner with SharePoint, a Microsoft based product in the US, a cloud based email and storage system. This will therefore involve transferring your data outside the European Economic Area (**EEA**).

Whenever we transfer your personal data outside of the EEA, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

7. DATA SECURITY

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. We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure (password and firewall protected) servers. All electronic transactions you make to or receive from us will be encrypted using SSL technology. **Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. You are responsible for keeping your password and user details confidential.** We will not ask you for your password.

In addition, we limit access to your personal data to those employees, agents 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 also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION AND STORAGE

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We review the personal data that we hold every 12 months.

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 requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for accounting, tax and legal purposes. This also helps us, for example, in the event that there is a complaint about our Services, to respond to you in full.

Details of retention periods for different aspects of your personal data are available from us by emailing us at nicola@thevfgroup.com

In some circumstances you can ask us to delete your data, see Request Erasure below for further information.

In other circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

The personal information we store that relates to our clients is stored our operating systems which includes MoveMan.

We store client names and email addresses in Outlook to contact them with business related updates. We only contact clients that we do business with.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which over-ride your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please email us at nicola@thevfgroup.com with specific details of who to contact for subject access rights.

NO FEE USUALLY REQUIRED

Data Subjects have the right to access their personal data and supplementary information. The right of access allows individuals to be aware of and verify the lawfulness of the processing.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or requires copies of previously provided information. Alternatively, we may refuse to comply with your request in these circumstances.

In the event of manifestly unfair or excessive requests we may refuse to respond to the request and any such refusal will be notified to the requester with a reason for the refusal and, in addition, information as to your rights to complain to the ICO or judicial authority within one month of such a request being received.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.