

## Legal and Privacy Policy

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us in the event you have a complaint.

This policy applies to all those who visit our website, contact us via phone, email and Facebook or who have had face to face contact with one of our employees to that extent relevant to those individuals and except where the policy indicates otherwise.

## WHO WE ARE

Melane Limited trading as B & G Jenkins. ("We") collect, use and are responsible for, certain personal information about you ("personal data"). We are a data controller under data protection law which includes the Data Protection Act 1998 and the General Data Protection Regulation 2016 as appropriate.

## B&G Jenkins RESPECTS YOUR PRIVACY

The protection of your privacy in the processing of your personal data is an important concern, which we pay special attention to during our business operations. We use ("process") your personal data collected during your visit to our website and when you provide your personal data to us in other ways, in a confidential manner and solely in accordance with the law including the General Data Protection Regulation ("GDPR")

## THE PERSONAL DATA WE COLLECT AND USE

### Information collected by us

We may collect your personal data when you provide it to us through our website, if you write to us or telephone our office or if you provide your details to us through a third party).

If you contact our office to make a request for a service appointment, enquire about our products and services, including our heating cover, or to provide feedback to us on our products and services

The personal data which we collect about you may include your name, postal address, your email address, contact telephone number, credit card details and details of any comments or feedback which you provide to us.

### What other information do we collect?

As you move around our website, subject to appropriate consents being obtained, we will collect information about your visit, such as which pages you visit, how often you visit and what links you click on.

This will include technical information such as Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, operating system and platform and information about your visit such as the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); products 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. To improve the services we provide, we also use Google Analytics to provide data for the above-mentioned activity as well as general website performance and usage statistics.

We may also receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that personal data that it may be shared internally and combined with personal data collected on this website site for the purposes set out in this policy, including helping us to build a profile of you to get to know you better, and so that we can personalise and enhance your customer experience with us.

#### HOW DO WE USE YOUR PERSONAL INFORMATION?

Information you give to us.

We will use this information:

to carry out our obligations arising from any agreements entered between you and us

and to provide you with the information, products and services that you request from us;

to carry out appropriate and necessary investigations and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements;

to send you a service reminder email to and other emails for the purposes of providing any services, products, competitions or promotions to you, including in relation to account management or system maintenance;

to provide you with marketing information about other services or products we offer that are like those that you have already purchased, or services or products you have consented to receiving on the site or; to notify you about changes to our services and/or products;

build a profile of you, your preferences and your habits to personalise and enhance your customer experience; to provide customer support; and/or

to ensure that content from the website is presented in the most effective manner for you and for your computer.

We may use the personal data we collect about you on an anonymised basis to create statistics and anonymised information which we then share with third parties including ad networks, search engines and analytics providers.

Please note we will not use any financial or credit card information for any purpose other than to discharge our legal / regulatory duties and to process payments paid by you for our products and services or due to you by agreement (e.g. refunds).

Information we collect about you.

We will use this information:

for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

to carry out appropriate and necessary investigations and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements, and (where applicable) to safeguard our staff and other customers / users in respect of unlawful, disruptive or objectionable behaviour on our premises or on our website;

to improve our website to ensure that content is presented in the most effective manner for you and for your computer;

to enhance our website experience to ensure you receive a personalised and continuously improving customer service;

to allow you to participate in interactive features of our website, when you choose to do so;

as part of our efforts to keep our website safe and secure;  
to deliver effective and personalised marketing material and content of B&G Jenkins  
to measure, understand or monitor the effectiveness of advertising, promotions,  
marketing material and content  
build a profile of you, your preferences and your habits;  
to measure or understand the effectiveness of advertising we serve to you and others,  
and to deliver relevant advertising to you where permitted

#### USING YOUR INFORMATION IN ACCORDANCE WITH DATA PROTECTION LAWS

Data protection laws require that we meet certain conditions before we can use your data in the manner described in this privacy policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal data, we will rely on the following conditions, depending on the activities we are carrying out:

Compliance with legal obligations: As an entity established under the laws of England and Wales, B&G Jenkins is obliged to comply with UK laws and guidance provided by UK regulatory bodies. We will process your personal data to verify your identity, establish your age, verify your source of funds for anti-money laundering and fraud purposes, and to establish whether you have been barred from any stores which stock our products or from using our site due to objectionable behaviour. We are also legally obliged to process your personal data in accordance with gas safety regulations. You will not be able to object to processing or ask for the deletion of your personal information insofar as it falls under this category.

Necessary for the entry into / performance of a contract: When you enter into a transaction with us, a contract between you and us will have been entered. For us to fulfil our obligations under such contract (e.g. to allow you to purchase goods from us), we will need to collect and process your personal data. Failure to provide the requisite personal information on sign-up and financial information on entering into the transaction or objecting to this type of processing / exercising your deletion rights will unfortunately mean we cannot provide our goods / services to you.

Consent: We may send you marketing messages by email, text message or telephone about us and our products and offers where you have not unsubscribed and where you have purchased products or other services from us. We may also send you information by post on the products and services which we provide which we believe may be of interest to you. We provide easy ways to stop our marketing, and you can opt out at any time by contacting us via email or reply to any email we send you

If you are not a customer of ours but you have provided us with consent to use your details for marketing purposes, then we may also contact you about our products and services.

In each of the situations above, you have the right to withdraw your consent at any time and can object to processing of this nature. Where you consent to us sending you marketing information, we will treat this as lasting for indefinitely unless we tell you otherwise at the time.

Legitimate interests: To use your personal data for any other purpose described in this privacy policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. This requires us to carry out

a balancing test of our interests in using your personal data (for example, in order to provide you with the information, products and services that you request from us), against the interests you have as a citizen and the rights you have under data protection laws (for example, to not have your data sold to third party marketing companies without your knowledge, or not store your personal data in insecure or unstable countries or regions). The outcome of this balancing test will determine whether we can use your personal data in the ways described in this privacy policy. We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

#### HOW LONG WE KEEP YOUR INFORMATION FOR

When your data is no longer required for the purposes listed above, we will delete it within the periods set out below:

Marketing consents will be refreshed/deleted after 5 years of no longer using or contacting B&G Jenkins or can be withdrawn at any time (see Clause 5);

#### **MARKETING**

We want to keep you informed about all our products, promotions and news, and where you have indicated you are happy to receive marketing by email, SMS or phone we will keep in touch with the latest news. We may also send you relevant information on products and services which we think may be of interest to you - you can easily opt out of this at any time by contacting as indicated below.

If you are an existing customer, we will contact you by e-mail, SMS, post or phone with information about products and services similar to those which you have already purchased from us. If you prefer not to continue to receive promotional or marketing information from us or from the other companies in our Group, please use the unsubscribe function in the information we send you or alternatively write to our Data Security Officer using the contact details in section 15.

#### WHERE WE STORE YOUR PERSONAL DATA

The personal data that we collect from you is stored on secure information technology systems. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy and data protection law. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures

#### PROTECTING YOUR INFORMATION

Our website uses up-to-date industry procedures to protect your personal information. We also protect the security of your data during transmission using Secure Sockets Layer (SSL) encryption software. We may vary this in the future if we feel you will benefit from greater security whilst using our website. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of information that we have collected from you via our site

Cookies Our website uses cookies, as almost all websites do, to help provide you with the best experience we can

## YOUR RIGHTS

You have a number of rights under data protection law in relation to the way we process your personal data, although these are not absolute and, in some instances, we may be unable to accept your request, in which case we will respond to you to explain why. These are set out **below**. You may contact us using the details on our website (or by contacting us directly to exercise any of these rights and we will respond to any request received from you within one month from the date of the request.

NUMBER	DESCRIPTION OF RIGHT
Right 1	A right to access personal data held by us about you.
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
Right 4	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.
Right 5	In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. This right will only apply where the processing is based on consent or a contract (see above) and the processing is carried out by automated means. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right 6	A right to object to our processing of personal data held by us about you where the processing of such data is necessary for the purposes of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process personal data which override your rights or which are for the establishment, exercise or defence of legal claims.
Right 7	A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you.

Right 8	A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).
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#### UPDATING YOUR INFORMATION

If you believe your details are incorrect you can amend your details by contacting us at the address provided below.