

Domestic Heating Services (Wholesale) Limited
Privacy Policy

Domestic Heating Services (Wholesale) Limited ("DHS") respects your privacy and is committed to protecting your personal data.

This privacy notice will inform you how we collect, use and look after your personal data. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you 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.

1. CONTROLLER

DHS is the controller and responsible for your personal data (collectively referred to as "DHS", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

2. CONTACT DETAILS

Our full details are: Domestic Heating Services (Wholesale) Limited, Longcamps, St Sampsons, Guernsey (Registered Number 2064)

Data Privacy Officer: Dataprivacyofficer@wolseley.co.uk

You have the right to make a complaint at any time to the Office of the Data Protection Authority (ODPA), Guernsey's supervisory authority for data protection issues (www.odpa.gg). We would, however, appreciate the chance to deal with your concerns before you approach the ODPA so please contact us in the first instance.

3. YOUR DUTY TO INFORM US OF CHANGES

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. If you notify us of any changes to your personal information we will correct, update or remove your data as speedily as possible. If you would like us to, correct, amend or update your information please e-mail us [at dataprivacyofficer@wolseley.co.uk](mailto:dataprivacyofficer@wolseley.co.uk).

4. INFORMATION WE COLLECT FROM YOU

We may collect, use, store and transfer the following different kinds of personal data about you:

- Name and contact details – this includes your name, title, billing address, delivery address, email address and telephone numbers
- Date of birth information
- Payment and Financial information – this may include your bank account and/or payment card
- Purchase history – this includes details about products you have purchased from us
- Profile information – this includes your username and password for any systems or websites you have access to (for example eXtra)
- Marketing information – this includes your interests, your preferences in receiving marketing from us and your communication preferences

- Survey responses and competition entries
- Customer service history – this includes interactions with us over the phone, by email or letter, via the website or on social media
- Record of any complaints and related communications
- Information about your device and how you use our website and apps – this includes information you give us when you browse our websites or apps, including your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, as well as how you use our websites and apps

Unless we have told you otherwise in a specific privacy notice, we do not collect any 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.

6. HOW WE COLLECT YOUR PERSONAL DATA

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

- **Direction interactions:** you may give us your name and contact details and payment information when purchasing a product from us or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - create an account with us;
 - register on our website;
 - purchase a product from us;
 - subscribe to our mailing lists or newsletters;
 - request marketing to be sent to you;
 - take part in a competition, promotion or survey;
 - trade in a branch via CCTV records; and
 - give us some feedback.
- **Automated technologies or interactions:** As you interact with our website and our apps, we may automatically collection information about your device and how you use our website and apps. We collect this personal data by using cookies, server logs and similar technologies. For more information on cookies, please see our cookie policy.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources such as:
 - information about your device and how you use our websites and apps from analytics providers such Google based outside the EU; and
 - Name and contact details, payment information and purchase history from providers of technical, payment and delivery services.

7. USES MADE OF THE INFORMATION

We (and our trusted partners acting on our behalf) use information held about you in the following ways:

- where we need to perform the contract, we are about to enter into or have entered into with you
- 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;
- for certain processing purposes, we may request your consent to authorise the processing.

Our legitimate interests include:

- Selling and supplying goods and services to our customers;
- Protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- Promoting, marketing and advertising our products and services;
- Sending promotional communications;
- Performing market research;
- Understanding our customers' behaviour, activities, preferences and needs;
- Improving existing products and services and developing new products and services;
- Complying with our legal and regulatory obligations;
- Preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- Handling customer contacts, queries, complaints or disputes;
- Use of CCTV to record in branch trading. Our CCTV records are typically held for between 28 – 32 days only determined by the type of CCTV equipment, when it is then automatically overwritten. Copies of CCTV footage should be requested via our data protection officer.
- Protecting DHS, its employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to DHS;
- Effectively handling any legal claims or regulatory enforcement actions taken against DHS; and
- Fulfilling our duties to our customers, colleagues, shareholders and other stakeholders.

8. WHO WE SHARE YOUR DATA WITH

We will share your personal information with the following bodies. Please note that we will never sell or rent our customer data to other organisations for marketing purposes:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
 - market research companies that require the data to fulfil marketing and research activities;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site;
 - credit reference agencies ("CRA's") for the purpose of assessing your credit score where this is a condition of us entering into a contract with you. CRA's will also give us information about you, such as your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRA's on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRA's will share your information with other organisations. The identities of the CRA's and the way in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>.
- We will disclose your personal information to third parties:
- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
 - If DHS or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
 - Governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so:
 - to comply with our legal obligations;
 - to exercise our legal rights (for example in or in order to enforce or apply our terms and conditions and other agreements);
 - for the prevention, detection, investigation of crime or prosecution of offenders;
 - and
 - or to protect the rights, property, or safety of DHS, our employees customers, or others.
 - Other companies and organisations for the purposes of fraud protection and credit risk reduction.
 - In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include IT, delivery and marketing service providers.

9. HOW LONG DO WE KEEP YOUR DATA?

We will not retain your data for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data. Please contact us if you require further details.

10. GLOSSARY

We recognise that some of the privacy law terminology can be a bit complicated, so we have set out below some further detail on some of the terms used in this policy:

Lawful basis:

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).

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. For example, where we are sending you a product you have purchased from us or where you have entered a competition on our website, we will be processing your personal data on the basis that it is necessary for us to do so in order to perform a contract between us.

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.