



Clayworks

PRIVACY POLICY

Natural Clay Plasters

Clayworks

Clayworks Ltd –PRIVACY POLICY

Welcome to Clayworks Limited's Privacy Policy. Clayworks Limited ("we" or "us") respect your privacy and are committed to protecting your personal data.

This privacy policy applies to:

- your use of our site www.clay-works.com ("our site");
- information you provide to us when enquiring about our products and samples;
- communications with us (whether in person or online);
- providing us with information via our social media accounts
- subscribing to our mailing lists;
- the provision of our products and samples,

and sets out the basis on which any personal data we collect from you (whether as an individual or an individual acting on behalf of an organisation) or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. This privacy policy also tells you about your privacy rights and how the law protects you.

Our site is not intended for children and we do not knowingly collect data relating to children.

Your acceptance of this privacy policy is deemed to occur upon your first use of our site. If you do not accept and agree with this privacy policy, you must stop using our site immediately.

PERSONAL DATA

You may be asked to provide personal data whilst you are in contact with us. Personal data is information that can be used to identify or contact you. You do not have to provide the personal data that we request, however, if you choose not to, we may not be able to provide you with the products or samples that you have requested.

CONTROLLER

For the purpose of the retained EU law version of the General Data Protection Regulations ((EU) 2016/679) and the Data Protection Act 2018 ("Data Protection Legislation") the data controller is Clayworks Limited a company registered in England and Wales with company registration number 04552140 whose registered office is at Lowin House, Tregolls Road, Truro, Cornwall, TR1 2NA. Our main trading address is at Clayworks Limited, Unit 5, Higher Bochym Rural Workshops, Cury Cross Lanes, Helston, TR12 7AZ.

INFORMATION WE MAY COLLECT FROM YOU AND HOW WE USE IT

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

- Identity Data includes title, first name, last name and business name. The identity data may be processed for the purpose of processing and delivering orders for products, considering requests for samples, processing and delivering orders for samples, managing our relationship with you (including notifying you about changes to our privacy policy and asking you to provide feedback), administering and protecting our business and site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). The legal basis for this processing is the performance of a contract and/or taking steps, at your request, to enter into such a contract and our legitimate interests (namely to recover payments, keeping our records updated, to study how our site is used, for the running of our business, provision of administration and IT services, network security).
- Contact Data includes postal address, billing address, business address, email address and telephone numbers. The contact data may be processed for the purpose of processing and delivering orders for products, considering requests for samples, processing and delivering orders for samples, managing our relationship with you (including notifying you about changes to our privacy policy

and asking you to provide feedback), following up and responding to direct communications with you, administering and protecting our business and site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). The legal basis for this processing is the performance of a contract and/or taking steps, at your request, to enter into such a contract and our legitimate interests (namely to recover payments, keeping our records updated, to study how our site is used, for the running of our business, provision of administration and IT services, network security).

- Financial Data includes bank account and payment card details (card type, number, name appearing on card, expiry date and CCV code). The financial data may be processed for the purposes of processing and delivering orders for products and sample (namely managing payments and charges and collecting monies). The legal basis for this processing is the performance of a contract and our legitimate interests (namely to recover payments due).
- Transaction Data includes details about payments to and from you and details of products and samples you have ordered. The transaction data may be processed for the purpose of processing your order or providing samples. The legal basis for this processing is the performance of a contract and our legitimate interests (namely our interest in the proper administration of our site and business).
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our site. The technical data may be processed for the purpose of administering and protecting our business and site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and to deliver relevant website content. The legal basis for this processing is our legitimate interests (namely to grow our business and to inform our marketing strategy).
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. The marketing and communications data may be processed for the purposes of sending you the relevant email notifications and/or newsletters. The legal basis for this processing is consent.

In addition to the specific purposes for which we

may process your personal data set above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

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). Nor do we collect any information about criminal convictions and offences.

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, phone, email or otherwise. This includes personal data you provide when you:
 - order products and samples;
 - provide invoice and payment information;
 - subscribe to our newsletters;
 - request marketing materials to be sent to you; or
 - give us some feedback or contact us.
- **Automated technologies or interactions.** As you interact with our site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties which include:
 - Technical Data from analytics providers (such as Google) based outside the UK and search engine providers based outside the UK; and
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services; and
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

INTERNATIONAL TRANSFERS

Some of the third parties which we work closely with are based outside of the UK so their processing of your personal data will involve a transfer of data outside of the UK.

Whenever we transfer your personal data out of the UK, we 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; and
- where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

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 data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

COOKIES

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 site may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy on our website www.clay-works.com/cookie-policy/.

CHANGE OF PURPOSE

We will ask for your consent before using personal data for a purpose other than those set out in this privacy policy, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like further information on purpose compatibility, please contact us.

DISCLOSURE OF YOUR INFORMATION

You agree that we may disclose your information (including personal data) to the following categories of third parties:

- suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- third party service providers, in connection with marketing services (for example, The Rocket Science Group LLC which operates MailChimp) and accounting and financial services;
- analytics and search engine providers that assist us in the improvement and optimisation of our site; and
- other data storage providers, in connection with cloud storage and hosting services.

Your personal data will not be shared with third parties for third party marketing purposes unless you have provided your express consent.

We may also disclose your personal data to third parties:

- where we have your consent to do so;
- to provide and/or improve our products and samples;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if Clayworks Limited or substantially all of our assets are acquired by a third party, in which case personal data held by us about you will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights of Clayworks Limited, our website users, customers, distributors, agents or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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.

YOUR RIGHTS

Under Data Protection Legislation, in certain circumstances you have the following rights in relation to your personal data:

- **Right to access.** You have the right to request access to information held about you. We will provide you with a copy of your personal data held by us free of charge (providing your request is not excessive or for multiple copies, in which case we may charge a reasonable fee to cover our costs) and certain information about the processing of your personal data and the source of such data (if not directly collected from you by us). You also have the right to request that your personal data is transferred to a third party.
- **Right to object to data processing.** You may withdraw your consent to the processing of your personal data at any time by contacting us or ticking a box to opt out of receiving marketing materials. Upon receipt of your notification, we shall promptly stop any processing of your personal data and (if requested by you) erase such information if we are not required to retain it for legitimate business or legal purposes.
- **Right to restrict processing.** You may ask us to suspend the processing of your personal data in the following circumstances:
 - if you do not think your personal data is accurate;
 - where we are found to be processing unlawfully but you do not want us to erase your personal data;
 - where you need us to continue holding your personal data to establish, exercise or defend legal claims; or
 - where you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

Right of rectification and right of erasure. You have the right to request that we correct or erase any inaccuracies in your personal data if such information would be incomplete, inaccurate or processed unlawfully.

Where we are relying on consent to process your personal data, you may withdraw consent at any time. 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

You can also exercise these rights at any time by contacting us at Clayworks Limited. We may reject requests that are unreasonable or require disproportionate effort (for example, such a request would result in a fundamental change to our existing practice) or risk the privacy of others.

THIRD PARTY LINKS

Our site may include links to third-party websites, plugins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

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. 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 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.

PERSONAL DATA RETENTION

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 in 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, accounting or other requirements. When personal data is no longer needed, we will securely delete or destroy it.

In some 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.

CHANGES TO OUR PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

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.

CONTACTING US

If you have any questions, comments or requests regarding this privacy policy or data processing or you would like to make a complaint, please contact us via email at clare@clay-works.com, by telephone on 01326 341339 and by post to Clayworks Limited, Unit 5, Higher Bochym Rural Workshops, Cury Cross Lanes, Helston, TR12 7AZ.

If you have any cause for complaint about our use of your personal data, please contact us using the details provided above and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk).

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Clayworks Limited, Unit 5, Higher Bochym Rural Workshops, Cury Cross Lanes, Helston, Cornwall, TR12 7AZ, UK
+44 (0)1326 341339 www.clay-works.com info@clay-works.com