

Robust Details Limited

PRIVACY POLICY

Major version	Reason for change	Description of main change(s)
1 (22 Oct 2012)	New edition	Cookies policy amended to address data protection requirements.
1.1	New address	Updated RDL address.
2 (21 May 2018)	GDPR requirements	Reference made to GDPR in section 4.1 New Sections added: Data Retention (5), Profiling (8), Complaints (12) Additional clauses added: (3 and 6.2) Fees for accessing information deleted in section 11 Ops Mgr replaced by Customer Service in section 15 Hyper links to other documents updated.

1. INTRODUCTION AND SCOPE

- 1.1 We want you to be clear about the information that we collect and what we do with it, so please read this policy very carefully, as it explains the basis on which any personal data that we collect from you or that you provide to us (whether online or offline) will be processed by us.

2. OVERVIEW

- 2.1 The website at www.robustdetails.com ("**the Site**") is owned and operated by Robust Details Limited ("**RDL**"), which is a private limited liability company incorporated under English law (company number 04980223). References in this policy to "**we**", "**us**" and "**our**" are references to RDL, and references in this policy to "**you**", "**your**" and "**user**" refer to any individual or business that accesses the Site for any reason and/or uses any of our services (together "**use**").
- 2.2 By virtue of your use, you consent to the collection, storage and processing of the personal data that we collect from you, and that you provide to us, in the manner set out in this policy.
- 2.3 Visitors to the Site who wish to register as members ("**Members**") should refer to our **Terms and Conditions for Website Membership and Use**. Members are able to make online purchases via the Site, and such purchases are governed by our **Terms and Conditions for Online Sales**.

3. WHAT INFORMATION MAY WE COLLECT?

We may collect, store and process the following data about you:

- information that you provide by filling in any form on the Site and/or sending any completed form to us. This includes information provided at the time of first using the Site, posting material or requesting further services. We may also ask you for information when you enter a competition or promotion sponsored by us, and when you report a problem with the Site;
- information that you provide if and when you register to access the Members area of the Site;
- information provided for plot registrations including information we require under our contract with you e.g. site contact details.
- records of any online or offline correspondence with you;
- your responses to our requests to complete surveys that we use for research purposes, although you do not have to respond to them;
- details of which of our products and services you are interested in;
- details of transactions that you carry out through the Site and of the fulfilment of your orders;
- details of your visits to the Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access;
- information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers (this is statistical data about our users' browsing actions and patterns, and does not identify any individual); and

- information about cookies, as to which please see section 7 below.

4. WHAT DO WE DO WITH THE INFORMATION?

4.1 We are required by the Data Protection Act 1998 and EU General Data Protection Regulation ("**the Act**") to follow strict procedures to protect customer information. We have a current registration (number Z8604214) in the Data Protection Register that is maintained under the Act. For further details about the Act see the Information Commissioner's website (www.ico.gov.uk).

4.2 We may use your personal information collected to help us to:

- identify the validity of users;
- ensure that content from the Site is presented in the most effective manner for you and for your computer, and make the Site easier for users, involving the collection of information on: browser type (e.g. Navigator, Internet Explorer), operating system (e.g. Macintosh, Windows), IP address and Internet domain (e.g. Demon, AOL);
- allow you to participate in any interactive content that we provide on the Site from time to time, when you choose to do so;
- notify you about changes to the Site;
- allow us to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- carry out our obligations arising from any contracts entered into between you and us and/or arising from any duty as referred to below;
- (if you are a Member) verify your Membership details and inform you of Membership news;
- contact you online or offline when required or when appropriate; and/or
- evaluate our business, conduct market research, diagnose problems with our servers, administer our system, or carry out any other purpose that we believe is permitted by applicable law.

4.3 If you agree that we can use your personal data to provide you with information that we feel may interest you, please tick the relevant box situated on the form with which we collect your data. Otherwise, leave the box on the form unticked or inform us via the contact details set out at the end of this policy.

5. DATA RETENTION POLICY

5.1 We retain the data of our contacts so that we can best provide our service to you and meet your needs, contact data must also be retained for contractual purposes so that we can fully respond to enquiries from Building Control Bodies and Warranty providers. This information is held securely and is only accessible by authorised personnel.

6. WILL WE PASS YOUR INFORMATION ON?

6.1 We may disclose your personal information to any **affiliates**, which means any subsidiaries, any ultimate holding company and any of its subsidiaries, as defined in section 1159 of the Companies Act 2006.

6.2 We may disclose your personal information to third parties:

- in the form of aggregated information about our users in order to provide them with data about target audiences;
- 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 we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- who are local or national authorities or Government entities involved with robust details and the Building Regulations or warranty and insurance companies providing cover on homes into which robust details have been built for the purpose of home registrations, inspections and/or claims handling;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any of our terms and conditions or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- operating under contract with us for the purpose of completing onsite monitoring and inspections

7. WHAT ABOUT "COOKIES"?

7.1 "**Cookies**" are small text files that, in the case of the Site, are stored by us on the hard drive of your computer or mobile device. We may use cookies for one or more of the following reasons: to allow you to navigate around the Site; to allow certain parts of the Site to operate (e.g. online purchasing requires a cookie to remember the contents of your shopping basket as you progress through the screens); to allow us to adjust content to suit your needs; to achieve the purposes mentioned in paragraphs 7.3 and 7.4 below; and to help us to improve your experience of the Site.

7.2 We use cookies to collect personal information about you for marketing purposes. However, if you would like to block or control the cookies used by the Site, you can do so through your browser settings. If you want to know how to do this, look at the help menu on your browser or visit an informative web site such as www.aboutcookies.org. Please note that, if you turn off the cookie function, some or all of the functions mentioned in paragraph 7.1 above will or may not operate.

7.3 We also use cookies to help us to distinguish you when you return to the Site and track the navigation paths you take. For example, we use Google Analytics to help us analyse how you use the site. Further information on how these cookies are used can be found at the Google Privacy site <http://www.google.com/intl/en/analytics/privacyoverview.html>.

7.4 We use SagePay to take payments for online sales and SagePay sets cookies that enable the payment process to work. These are temporary cookies (known as 'session cookies') that cease to exist once you close the browser after accessing the Site.

8. PROFILING

8.1 We use software such as Click Dimensions so that we can assess how our customers travel through our Site as well as the effectiveness of our Newsletters and other marketing activity. This helps us better layout our Site so that it is easier for customers to navigate as well as being a helpful tool to identify where errors are occurring. Click Dimensions uses cookies on our Site in order to be able to deliver us these analytics.

8.2 To opt out of profiling please visit the link www.aboutcookies.org for more information.

9. WHERE DO WE STORE YOUR PERSONAL DATA?

9.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

9.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data in accordance with this policy, we cannot guarantee the security of any of your data that are transmitted to the 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.

10. WHAT ARE YOUR RIGHTS?

10.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by ticking certain boxes on the forms that we use to collect your data. You can also exercise the right at any time by contacting us at the email address given below.

10.2 The Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

11. WHAT ABOUT ACCESS TO THE INFORMATION?

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. You have the right to request from RDL access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability. Any rights exercised by the user must be subject to compliance with our contractual terms.

12. COMPLAINTS

12.1 If you wish to complain about how your data is being held then you have the right to lodge a complaint. To do so please get in touch with us at customerservice@robustdetails.com, if you are not satisfied with our response then you can contact the Information Commissioners Office (www.ico.org.uk)

13. WHAT ABOUT CHANGES TO OUR PRIVACY POLICY?

Any changes that we may make to our privacy policy in the future will be posted on this page and, where appropriate in our opinion, notified to you by e-mail. You are expected to check this page from time to time to take notice of any changes that we make to it.

14. WHAT ABOUT FEEDBACK?

We welcome feedback from you on your experience of using the Site and other use. Any feedback submitted by you becomes our property, and we may use it for marketing purposes and/or to contact you for further feedback.

15. HOW DO YOU CONTACT US?

If you have any questions or concerns regarding this policy, please contact us by emailing customerservice@robustdetails.com, or by writing to us (marked for the attention of Customer Service) at the address of our registered office and place of business, namely:-

Block E
Bletchley Park Science and Innovation Centre
Milton Keynes
Bucks
MK3 6EB
United Kingdom

Further contact details are given on our Site.