

COOKIES & PRIVACY NOTICE

Triumph Furniture Limited is committed to complying with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, once enacted. Looking at the personal information you share with us is very important and we want you to be confident that your personal data is kept safely and securely and to understand how we use it to offer you a better service from us.

We have published this notice to help you understand

- How and why Triumph collect information from you;
- Who we share your information with, why and on what basis
- What your rights are

If we make changes to this notice we will notify you by updating it on our website, Triumph Furniture Limited will be what is known as the 'Data Controller' of the personal data you provide to us and we will sometimes refer to ourselves in this notice as 'we' or 'us'. By Data Controller, this means Triumph Furniture Limited determines the purposes and way in which any personal data is, or will be processed.

Should you need to contact us, please write to:

Data Protection Officer, Triumph Furniture Limited, The Willows, Merthyr Tydfil, CF48 1YH or email dataprotection@triumphfurniture.com, quoting Security & Privacy Enquiry.

This privacy notice was last updated on 14th May 2018.

WHAT INFORMATION WE COLLECT WHEN YOU PURCHASE FROM US AND WHY?

When you buy goods from us, you are entering into a contract with us. You will need to set up an Account before ordering from us, so we can set this up we will ask you to provide some personal information such as:

- Full name
- Company name
- Address
- Contact numbers
- Email address

As an existing customer if you have purchased from us using a credit or debit card, or we have taken these details for a payment authorisation.

When you apply for a credit account, we will get information about you from credit reference agencies. This is covered in more detail in the section 'Who we share your information with and why'.

In order to undertake website personalisation, we will also gather information about the devices you use to access our site (desktop and mobile) and this may include an IP address. For further information of our use of cookies and tracking please see our Cookie Notice.

When you visit our sites in Merthyr or Dowlais Triumph Furniture uses CCTV for security monitoring purposes.

HOW DO WE USE YOUR INFORMATION?

Data Protection says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of these reasons and these are:

- **Contract** – your personal information is processed in order to fulfil a contractual agreement.
- **Consent** – where you agree to us using your information in this way, e.g. for storing your payment card details.
- **Legitimate interests** – this means the interests of Triumph Furniture Limited in managing our business to allow us to provide you with the best products and service in the most secure and appropriate way, e.g. to transfer your data to certain Third Party's such as delivery partners.
- **Legal obligation** – where there is a statutory or other legal requirement to share the information, e.g. when we have to share your information for law enforcement purposes.

Here is a list of the ways that we may use your personal information and which of the reasons described above we rely on to do so. Where we list legitimate interests as a reason, we also describe below what we believe these legitimate interests are.

WHAT WE USE YOUR PERSONAL INFORMATION FOR	OUR REASONS (LEGAL BASIS)	OUR EXPLANATION OF TRIUMPH'S LEGITIMATE INTERESTS
Set up your Triumph account	Legitimate interest	Process efficiency in dealing with such activity
Process your orders	Fulfilling a contract	N/A
Notify you of your order status	Legitimate interests	Process efficiency in dealing with such activity, and to make improvements to our services
Manage your account/ provide customer services to you. This may include: transfers to Third Countries who undertake customer services/ communications activities call recording data verification customer complaints/queries	Legal obligation/ Legitimate interests (depending on nature of services)	Keeping our records up to date, handling our customer contact efficiently and effectively, working out which of our products and services may interest you and telling you about them
To detect, investigate and report financial crime (e.g. Fraud)	Legal Obligation / legitimate interests	Developing and improving how we deal with financial crime. Complying with any legal obligation placed on us by regulators such as the FCA. Complying with any regulations that apply to us. Process efficiency in dealing with such activity, and to make service and process improvements

Undertake website personalisation and administration	Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites. Defining types of customers for new products or services
Marketing communications to inform you of special offers, promotions, new lines and Sales.	Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites
Notifying you about enhancements to our services, such as changes to the website and new services that may be of interest to you	Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites
Contact you to undertake customer satisfaction surveys, invite you to provide product reviews or for market research	Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites
Maintaining network and data security	Legitimate interests	To maintain the security of our network this in turns helps us to maintain the safety and confidentiality of your information
Logistics planning, demand forecasting, management information and research	Legitimate interests	We use information about shopping habits, products bought and volumes, to help us to respond to demand, ensure the right products get to the right areas and to help us plan our ranges

WHO WE SHARE YOUR INFORMATION WITH AND WHY?

Triumph Furniture Limited works with a number of trusted suppliers, dealers and businesses in order to provide you with the high quality goods and services you expect from us such as delivery companies, credit reference agencies, fraud prevention agencies, product technicians and market research companies amongst others.

Some of examples of the categories of third parties with whom we share your data are:

Supplier Partners - Triumph Furniture Limited works with a number of trusted partners who supply products and services on our behalf. All partners are subject to thorough security checks and will only hold the minimum amount of personal information needed in order to fulfil the orders you place or provide a service on our behalf.

Delivery Partners - In order for you to receive your products, Triumph Furniture Limited works with a number of delivery partners. Again, we only pass limited information to them in order to ensure delivery of your products.

IT Companies - Triumph Furniture Limited works with a business that supports our website and other business systems.

Marketing Companies - Triumph Furniture Limited works with marketing companies who help us manage our electronic communications with you or to carry out campaigns, surveys and product reviews on our behalf.

Payment Processing - Triumph Furniture Limited works with trusted third party payment processing providers in order to securely take and manage payments.

Credit Reference Agencies - When you apply for credit with us we will make searches about you with credit reference agencies. We do this to make sure customers who apply for credit accounts are able to manage the level of credit offered and are not committing fraud by providing false or inaccurate information.

In order to process your application we will supply your personal information to credit reference agencies (CRA's) and they will give us information about you, such as your financial history. We do this to assess your creditworthiness and product suitability, check your identity, manage your account, trace, recover debts and to prevent criminal activity.

We will also continue to exchange information about you with the 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 ways in which they use and share personal information are explained in more detail at:

Experian [Credit Reference Agency Information Notice](#)

CallCredit [Credit Reference Agency Information Notice](#)

Equifax [Credit Reference Agency Information Notice](#)

We will use automated credit-scoring methods to assess your application and to confirm your identity. We will automatically check your credit history against our criteria and if you don't meet our requirements you will be declined for credit. For more information see the CRAIN notices above. There is also an automated decision section below with further detail. Should you wish to object to the use of automated credit scoring, please contact the Data Protection Officer.

Debt recovery and fraud prevention services - Before we provide services, product or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering and to verify your identity.

Details of the personal information that will be processed include, for example, name, company name, address, contact details, device identifiers including IP address.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering and also to verify identity in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

We process your personal data on the basis that it is necessary in the public interest or in exercising official authority for us to prevent fraud and money laundering and to verify identity, in order to protect ourselves and to comply with laws that apply to us.

Fraud prevention agencies can hold your personal data for different periods of time and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

AUTOMATED DECISIONS

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision-making: if you want to know more please contact us using the details above.

CONSEQUENCES OF PROCESSING

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or we may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in others refusing to provide services or financing. If you have any questions about this, please contact us on the details above.

DATA TRANSFERS

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

YOUR RIGHTS

Your personal data is protected by legal rights which include your rights to object to our processing of your personal data. You may therefore request that your personal data is erased or corrected or, request access to your personal data.

For more information or to exercise your data protection rights please contact us using the contact details above. You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data.

TRANSFERS TO THIRD COUNTRIES

Some of the information you provide to us may be transferred outside the European Economic Area to countries. Although the data is held in the UK, colleagues in such countries may access it to undertake the activities described above.

Triumph Furniture Limited also works with suppliers and partners who may make use of cloud and/or hosted technologies. We undertake data security due diligence on our partners and ensure that these partners conform to appropriate accreditations. Wherever transfers of data to third countries occurs, Triumph Furniture Limited will put in place appropriate contractual provisions to ensure that there are strict rules regarding both the confidentiality and security of your information. To find out more please contact us at dataprotection@triumphfurniture.com.

KEEPING IN TOUCH WITH YOU

We want to keep you up to date with information about new ranges, special offers and improvements to our website. When you set your account up, we will ask you if you want to receive this type of marketing information.

Triumph will not share your information with companies outside of Triumph Furniture Limited for their marketing purposes.

If you decide you do not want to receive this marketing information you can request that we stop by writing to the Data Protection Officer at dataprotection@triumphfurniture.com or the unsubscribe link within the email.

You may still continue to receive mailings for a short period while your request is dealt with.

HOW LONG WE KEEP YOUR INFORMATION

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the data it is no longer needed by us for any of the purposes listed under 'How we use your personal information above'. The only exceptions to this are where:

- The law requires us to hold your personal information for a longer period, or delete it sooner
- You exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under law
- We bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appears are possible
- In limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period

WHAT ARE YOUR RIGHTS?

You are entitled to request the following from Triumph Furniture Limited your Data Subject Rights and there is more information on these on the Information Commissioners website www.ico.org.uk.

Right of access – to request access to your personal information and information about how we process it.

- **Right to rectification** – to have your personal information corrected if it is inaccurate and to have incomplete personal information completed.
- **Right to erasure** (also known as the Right to be Forgotten) – to have your personal information erased. Contact dataprotection@triumphfurniture.com.
- **Right to restriction of processing** – to restrict processing of your personal information.
- **Right to data portability** – to electronically move, copy or transfer your personal information in a standard form.
- **Right to object** – to object to processing of your personal information.
- **Rights with regard to automated individual decision making, including profiling** – rights relating to automated decision making, including profiling.

If you have any general questions about your rights or want to exercise your rights please contact **dataprotection@triumphfurniture.com**.

COOKIE NOTICE

This notice is designed to help you understand what cookies are, how Triumph Furniture Limited uses them and the choices you have in records to their use.

By continuing to use the www.triumphfurniture.com the 'Site' you are agreeing to our use of cookies in the manner described in this notice.

WHAT ARE COOKIES?

Cookies are small text files that are stored on your browser or the hard drive of your computer or other device when you visit the Site. This allows the Site to recognise you as a user either for the duration of your visit (using a 'session cookie') or for repeat visits (a 'persistent' cookie). They are not harmful and do not contain any information such as your business address or credit card details.

The cookies we use fall into four broad types:

Strictly Necessary Cookies - These Cookies are essential in helping you to move around our Site and use its features, such as accessing secure areas of the website. Without these Cookies, services you have asked for such as setting up an account cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you've been on the internet.

Analytical/Performance Cookies - In order to keep the Site, its services and products relevant, easy to use and up to date, we use web analytical services to help us understand how people use our site. For example we can see which parts of the Site and products are most popular, identify when errors occur and to test different versions of a page or feature to see which one works best.

Functionality Cookies - These cookies allow websites and applications to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. The information these cookies collect is usually anonymised which means we can't identify you personally. They do not gather any information about you that could be used for selling, advertising or remembering where you've been on the internet, but do help us to serve you with advertising that is more relevant to you.

Targeted Marketing Cookies - We also use cookies to assist in targeted marketing. Without these cookies, online advertisements you encounter will be less relevant to you and your interests. We also use them to measure the effectiveness of our marketing communications, for example by telling us if you have responded to a campaign that we have sent you.

If you would like more information on any of these types of Cookies, including how to opt-out, please contact: **dataprotection@triumphfurniture.com**.

WHAT DO WE USE COOKIES FOR?

- They enable you to transact, whilst other non-essential cookies enable us to give you an enhanced, personalised web experience and determine relevant products to show you.
- To personalise and improve your customer experience.
- To allow you to securely sign into your Account with Triumph so that you can use 'My Account' features such as order information.
- To recognise the device that you are using.
- To store the content of your online order whilst you browse the site and to complete an order.
- To record the areas of the Site that you have visited, products you have viewed and time spent browsing, as well as the products you have purchased. Triumph Furniture uses this information to help make the website more user friendly, develop our Site design and to continually improve the quality of service that we provide.
- To distribute visitors to our Site evenly across platforms to ensure the content is served at the fastest possible speed.
- For re-marketing purposes to determine relevant related products to show you when you're browsing on other selected websites. These cookies can be associated with services provided by a third party such as an advertising network.
- We also offer you the facility to share your experience on our Site through social media sites such as Facebook and Twitter. By using these features, you are consenting to allow cookies from these providers. More information about how these providers use cookies can be found at their websites.

Cookies are an essential part of how our Site works, as they remember certain information about a visitor. Triumph Furniture uses First Party cookies (these are placed there and used solely by Triumph Furniture Limited) and Third Party cookies (these are placed there by third parties we work with).

Are Cookies Safe? - Yes. The information stores in cookies is safe and anonymous to any external third party and your account security is never compromised. You can find more about cookies at www.allaboutcookies.org.

Can I turn off Cookies? - Yes – but if you choose not to allow the use of cookies, your experience of our Site will be limited and many integral aspects of the Site, including (but not limited to) accessing your account will not work at all.

To change your cookie settings, or if you want to be notified each time a cookie is about to be used, you should amend the settings provided in your web browser to prevent us from storing cookies on your computer hard drive.

Opting Out - Website visitors who don't want their data used by Google Analytics can install the Google Analytics out-out browser add-on. To opt out of Analytics for the web, visit the Google Analytics out-out page and install the add-on for your browser.

This Cookie Notice was last updated on 3rd May 2018 and any further changes will be communicated by updating this notice.

