



Corporate Governance

Group Privacy Notice

Owner	Group General Counsel & Company Secretary
Last reviewed	September 2022
Version	1

SIG plc and subsidiary companies respect your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

The data controllers of your personal information are SIG plc/SIG Trading Ltd which are registered with the Information Commissioners Office under registration numbers Z569598X/Z9839318.

WHO WE ARE

SIG is a leading distributor of specialist building products headquartered in the United Kingdom and operates from trading sites across the UK, Ireland and Mainland Europe.

For more information about SIG please see the about us section of our corporate website at www.sigplc.com or by following this [link](#).

PERSONAL INFORMATION RELATED TO YOU

We ask you to provide certain information voluntarily. The types of information we ask you to provide, and the reasons why we ask you to provide it, may include:

Types of personal information	Why we collect it (Purpose for Processing)
Your individual/company name Your individual/company address Your individual/ contact telephone numbers Your individual/ contact email addresses Your signature Credit rating and bank details CCTV images	For account administration: including opening up an account, verifying your identity, undertaking credit related searches, invoicing, managing credit limits and payments.
Sales information relating to the sale of products or services to you or their repair or return Correspondence or other communications with you about our products, services or business	For managing and performing our contracts with you: including answering enquiries, providing quotations, dealing with plans and specifications, placing orders, delivering goods to you or your customers and dealing with any issues arising including warranty claims.
	For the purchasing of products or services from you. For marketing: promoting our products & services, monitoring your transactions with

	<p>us to enable us to provide you with the most relevant offers and information to you and marketing to you unless you've told us not to.</p> <p>For protecting the rights, property or safety of our visitors and customers.</p>
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HOW WE MAY COLLECT YOUR INFORMATION

- From our websites.
- When you visit a branch.
- Via our mobile applications.
- Via social media platforms.
- When corresponding with us by phone, email or otherwise.
- By entering competitions run by us.
- By taking surveys undertaken by us or on our behalf.
- When participating in promotional events.
- When you open an account with us.
- Information relating to recruitment.

SPECIAL CATEGORIES OF PERSONAL DATA

Some of the personal information we collect about you, or which you provide to us about you, may be "special categories of personal data". Special categories of personal data include information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data for identification purposes.

INFORMATION THAT WE OBTAIN FROM THIRD PARTY SOURCES

From time to time, we may receive personal information about you from third party sources which may include but not limited to credit referencing services, sales lead providers, and marketing service providers but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

We use the information we receive from these third parties to perform credit reference checks, for marketing our products or services.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may disclose your personal information to the following categories of recipients:

- Group companies
- Our suppliers, service providers and subcontractors
- Credit referencing services
- Debt collectors
- Our legal and other professional providers, including auditors
- Cloud service providers
- Fraud prevention agencies
- Payment processors in relation to credit/debit card payments
- Technical and support service providers
- Insurers and logistics suppliers
- Manufacturers
- Companies assisting us in our marketing, advertising and promotional activities
- Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person
- To a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice
- To any other person with your consent to the disclosure

LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

We will normally collect and process personal data from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person, for example, CCTV footage.

If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

EEA visitors only

If you're a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

KEEPING PERSONAL INFORMATION SECURE

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include but are not limited to the encryption of your personal information in transit and at rest, secure storage at UK Data Centres, cyber security protocols and bespoke training for all employees.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country and, in some cases, may not be as protective.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the approved Standard Contractual Clauses for transfers of personal information outside of the United Kingdom, which require all our third party service providers and partners located in a third country to protect personal information they process from the UK in accordance with UK data protection law.

DATA RETENTION

We retain personal information we collect from you where we have an ongoing legitimate business need to do so, for example, to provide you with a service you have requested or to comply with applicable laws, tax or accounting requirements and to exercise or defend our legal rights. The retention period will depend on the purposes for which we collect and use it.

For example, we will retain your personal information for seven years in case of any investigation by the tax authorities

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible, for example, because your personal information has been stored in backup archives, then we will securely store your personal information and isolate it from any further processing until deletion is possible.

AUTOMATED DECISION-MAKING

In some instances, the use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review. If we use software algorithms to make automated decisions we will implemented measures to safeguard the rights and interests of individuals whose personal information is subject to automated decision-making.

When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contact us.

YOUR DATA PROTECTION RIGHTS

You have certain rights in relation to your personal information. There is normally no charge for exercising these rights. If you would like further information in relation to these rights, or would like to exercise any of them, please contact us at the address at the end of this Privacy Notice.

In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one calendar month after we have received this information or, where not required, after we have received your request.

Subject to any exceptions, you may have the right to:

Access your personal information:

You have the right to ask for a copy of the information we hold about you by emailing or writing to us. We may not provide you with a copy of your personal information if this

identifies other data subjects or we have another lawful reason to withhold such information.

As a data controller we will endeavour to comply with your request promptly and in any event prior to the prescribed one calendar month period beginning with the relevant day. "The relevant day", in relation to a request means the day on which we receive the request or, if later, the first day on which we have received both the required fee (if applicable) and sufficient information to locate the information you require.

Under data protection law where a request is deemed to be complex, manifestly unfounded and/or excessive we are permitted to extend the period to comply with a request by a further two months and charge a reasonable fee taking into account the administrative costs to provide the information requested. Should the volume of information requested, including emails, be deemed excessive in relation to the period taken to review and redact such information, or otherwise be complex and we need to extend the provision period and charge a fee we will contact you to advise you of this.

Correct, modify and update your personal information:

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this Privacy Notice.

Erasure of your personal information or restrict its processing:

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us. Unless there is a reason the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

Withdraw your consent:

Where you have given your consent to our processing of your personal data you may at any time withdraw your consent. Unless we have another legal basis to process your personal data (such as compliance with a legal obligation) we will cease any processing of your personal data following receipt of your notice of withdrawal of consent.

Object to our use of your personal information:

Where we rely on legitimate business interests as the legal basis for processing your personal information for any purpose(s) set out above or at the time your data is collected, you may object to us using your personal information for these purposes by emailing or writing to us. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request.

Ask us to transfer your personal information in a structured data file to you or to another service provider if it is technically possible (data portability):

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, you may ask us to provide you with a copy of such information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if it concerns other individuals or we have another lawful reason to withhold such information.

Lodge a complaint with the competent supervisory authority and seeking a judicial remedy:

If you are concerned about the way we have processed or collected your personal information you have the right to complain to the UK data protection regulator being the Information Commissioners Office.

UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

HOW TO CONTACT US

If you have any questions about how we collect, store and use your personal information, or if you have any other privacy-related questions, please contact our Data Protection department via:

Email: dataprotection@sigplc.co.uk

Post: **Adsetts House**

16 Europa View

Sheffield Business Park

Sheffield

S9 1XH