

# **Privacy Policy**

### Introduction

TCM Living are committed to protecting personal data. This privacy statement describes why and how we collect and use personal data and provides information about the rights of individuals.

Personal data is any information relating to an identified or identifiable living person and includes information such as, but not exclusively, Name, Address, Telephone Numbers, Email Address etc. When collecting and using personal data our policy is to be transparent about why and how we use your

TCM Living do and will share personal data with third parties under strict guidelines only in order to allow them to carry out specific exercises on behalf of the company.

Under no circumstance do we sell or otherwise release personal data contained within our systems to third parties for the purpose of allowing them to market their own products and services. If this policy was to change in the future, explicit consent would be requested prior to any of this personal data being shared.

## **Processing Activities**

### **Business Contacts**

TCM Living process personal data about existing and potential customers and individuals associated with them.

This information is collected only by authorised representatives of the company and include, but not exclusively, Name, Name of company, Phone, Email and other business contact details.

The personal data collected may only be used by authorised users for the purpose of:

Administering, managing and developing business relationships. Providing information about us and the products we offer. Making contact information available to other authorised users. Performing analytics such as trends, sales intelligence for the use by TCM Living leadership team.

### **Third Party/End Consumers**

Our policy is to collect only personal data necessary for agreed purposes and we ask our customers to only share personal data where it is strictly needed for the purpose defined.

In general terms we would only collect personal data from our customers or third parties where we are acting on their behalf for the purpose of carrying out the instructions of the relevant customer. An example of this would be after sales customer

The only exception to the above is where personal data is required to ensure that the company complies with any requirement of law.

Where such personal data is required we ask our customers or their representatives to provide necessary information to the data subjects regarding its use prior to disclosing any personal data collected to the company.

Personal data provided in this manner would be used for the sole purpose of carrying out professional services provided to our customer. Where necessary personal data collected in this manner may be passed to third parties. However, this would be only in order to allow the professional services offered to be completed. Under no circumstance are these third parties allowed to use or share personal data for any other purposes.

The personal data required for completing these agreed purposes include but not exclusively:

Address Telephone Numbers **Email Address** Other contact information

### **Direct Sales**

On rare occasions the company may agree to a direct sale of products or service, in these circumstances personal data is recorded in order to allow the normal operation of the business to proceed in supplying the goods/services agreed.

This data is not collected automatically by the company and is in the control of the individual concerned and is handled as described below:

Data provided is used solely for the purpose of providing the goods/services agreed in advance.

Data is only accessed by authorised users with legitimate reasons for processing the data.

Data is never disclosed to 3rd parties without prior approval of the data subject.

Data is retained only for the period required in order to complete the activities agreed or in relation to any warranty period aranted.

Data is securely destroyed when the data is no longer required. Others who get in touch with us

We may and do collect personal data when an individual gets in touch with us with a request for information or other activity such as a fabric sample.

In these cases, the individual is in control of the data shared with us and we will only use the data for the purpose of responding to the communication.

### Visitors to our Website

Visitors to our websites may interact with us in a number of ways. However, visitors are generally in control of the personal data shared with us.

### Sample Requests

Visitors to the websites may requests samples of fabrics from the range of products that we produce, in order to process these requests, we collect Name, Address, Telephone and Email Address details. This information is used solely for the purpose of providing the requested samples.

### Contact Us

Visitors to the websites are able to send an email to us through the websites. Their messages will contain the users screen name, email address, potentially telephone, as well as any additional information the user may wish to include in the









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message body. This information is used solely for the purpose of replying to the contact raised. We request that you do not provide sensitive information, such as race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; sexual life or sexual orientation and criminal records, to us when using our websites.

#### Subscribers

Visitors to our websites can subscribe for updates on the products that we offer by registering on our websites, at this point personal data such as Name and Email address is collected.

Subscribers can choose to opt out of further updates from the company by simply contacting us using the email addresses below and requesting that your details are removed from the database.gdpr@ashleymanor.co.uk gdpr@alexanderandjamessofas.com Subscriber information is not passed to any 3rd parties for use.

In addition to the above we use small files called "Cookies" on our website which are placed on the hard drive of visitors to our websites to enrich your browser experience. The use of cookies is now standard operating procedure for most websites, however if you are uncomfortable with the use of cookies most browsers now permit users to opt-out of receiving them.

In order to gain the most out of your visit to our websites you would need to accept cookies as you may find some functionality is impaired. You can always delete cookies from your system after completing your visit to our website.

### **Social Media Outlets**

Although the company operates a number of Social Media sources such as Facebook, Twitter, Google+ and Instagram the company does not extract, store or use personal data from these sources in any way.

Suppliers (Including Sub-Contractors and Individuals Associated with them)

We collect and process personal data about our suppliers, sub-contractors, individuals associated with our suppliers and individuals associated with our sub-contractors for the purpose of managing the relationship, contract, to received services from our suppliers and, where relevant, to provide professional services to our clients.

### **Employees and Agents**

We collect personal data concerning our own personnel as part of the administration and management of our business

Employees are advised to refer to the Internal Employee Privacy Policy for further information regarding what, why and how personal data is collected and processed.

### Security

We take the security of all the data we hold very seriously and have a framework of policies and procedures in place covering data protection, confidentiality and security.

#### Amendment of Personal Data

Personal data may and will change from time to time and the accuracy of any data we hold is very important to us, therefore if at any time you wish to amend/update the personal data submitted to us you may email the relevant email address below or contact us via one of our websites or by contacting the relevant department.

AMU gdpr@ashleymaor.co.uk AMX gdpr@amx-design.co.uk A&J gdpr@alexanderandjamessofas.com Alstons gdpr@alstons.co.uk

Once we are informed that any personal data processed by us is no longer accurate we will make corrections, where appropriate, as soon as practicably possible.

### Withdrawal of Consent

Where we process personal data based on consent, individuals have the right to withdraw consent at any time. To withdraw consent please contact the relevant email address or contact us via one of our websites or by contacting the relevant department.

AMU gdpr@ashleymaor.co.uk AMX gdpr@amx-design.co.uk A&J gdpr@alexanderandjamessofas.com

### Complaints

We hope that you won't ever need to complain about our use of personal data, however if you need to then please email the relevant email address below.

AMU gdpr@ashleymaor.co.uk AMX gdpr@amx-design.co.uk A&J gdpr@alexanderandjamessofas.com Alstons gdpr@alstons.co.uk



