



## Data Protection Policy

Welcome to Glen Barry Limited's (GB) privacy notice. This privacy notice is issued on behalf of the Glen Barry Limited and is referred to as "GB", "we", "us" or "our" in this privacy notice.

GB respects your privacy and is committed to protecting your personal data. This privacy notice explains how GB use and protect any personal data that we may collect about you and informs you of your privacy rights and how the law protects you.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how GB collects and processes your personal data through your use of our services.

It is important that you read this privacy notice on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

#### CONTACT DETAILS

Should you wish to contact us, our contact details are as follows:

In the United Kingdom

Company Secretary  
Glen Barry Limited  
The Recycling Centre  
Langar Trading Estate North  
Harby Road  
Langar  
Nottinghamshire  
NG13 9HY

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data

protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## CHANGES TO YOUR PERSONAL DATA

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.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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, maiden name, last name, and date of birth.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of the products and services you have purchased from us.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law, as this data does not directly or indirectly reveal your identity. For example, we may analyse the number of times you visit a yard to calculate the percentage of customers visiting the yard at a given time. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel the product or service you have purchased from us but we will notify you if this is the case at the time.

## 3. 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, e-mail or otherwise. This includes personal data you provide when you:
  - create an account
  - interact with us via our social media accounts

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data where a lawful basis allows us to. Most commonly, we will use your personal data in the following circumstances:



Performance of a Contract. Where use of your information is necessary to provide you with GB services under a contract



Legitimate Interest. Where use of your information is necessary for our or others' legitimate interests and where the use is not outweighed by your rights and interests. Below are some examples of such interests:

- improving our services and developing new ones
- recognizing and better understanding our users, including across platforms
- conducting security and fraud prevention activities
- marketing and promoting our content and services

- building and managing business relationships
- conducting compliance and risk management activities
- providing and managing access to our systems.



**Legal Obligation.** Where use of your information is necessary to comply with laws and regulations such as those relating to anti-bribery and corruption and anti-money-laundering, the Scrap Metal Dealers Act and complying with requests from government bodies or courts or responding to litigation.



**With Consent.** We may ask for your consent to process your information in a certain way. Where we rely on this basis, you have the right to withdraw your consent at any time.

Generally, we do not rely on consent as a lawful basis for processing your personal data other than in relation to sending direct marketing communications to you via post, email or text message. You have the right to withdraw consent from marketing at any time by contacting us at [accs.glenbarry05@gmail.com](mailto:accs.glenbarry05@gmail.com).

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely upon to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [accs.glenbarry05@gmail.com](mailto:accs.glenbarry05@gmail.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<b>To register you as a new customer</b>	(a) Identity (b) Contact	Performance of a contract with you
<b>To process and deliver your transaction including:</b> <b>(a) Manage payments, fees and charges</b> <b>(b) Collect and recover money</b>	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<b>owed to us</b>		
<b>(c) Fulfil payments owed to you</b>		
<b>To manage our relationship with you which will include:</b>	(a) Identity (b) Contact (c) Marketing	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services)
<b>(a) Notifying you about changes to our terms or privacy policy</b>		
<b>(b) Asking you to leave a review or take a survey</b>		
<b>To administer and protect our business and website</b>	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
<b>To make suggestions and recommendations to you about goods or services that may be of interest to you</b>	(a) Identity (b) Contact (c) Technical (e) Marketing	Necessary for our legitimate interests (to develop our services and grow our business)

## PROMOTIONAL OFFERS FROM US

We may use your identity, contact and technical data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant to you (we call this marketing).

## THIRD-PARTY MARKETING

We do not share your information with third parties for their marketing purposes.

## OPTING OUT

You can ask us to stop sending you marketing messages at any time by contacting us at [accs.glenbarry05@gmail.com](mailto:accs.glenbarry05@gmail.com) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a transaction.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [accs.glenbarry05@gmail.com](mailto:accs.glenbarry05@gmail.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with Internal/Associated Third Parties (as explained in the glossary) for the purposes set out in the table above.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, the new owners may use your personal data in the same way as set out in this privacy notice.

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.

## 6. 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.

## 7. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

## 8. YOUR LEGAL RIGHTS

If you are an EU resident, you have the following rights under data protection laws in relation to your personal data.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

For information on the categories of personal data we have collected about you, the categories of sources for such personal data, the business purposes for collecting such personal data and with whom we share such personal data, please refer to the sections titled “The data we collect about you,” “How is your personal data collected?,” “Purposes for which we will use your personal data” and “Disclosures of your personal data,” respectively.

If you wish to exercise any of the rights set out above, please contact us at [accs.glenbarry05@gmail.com](mailto:accs.glenbarry05@gmail.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 9. GLOSSARY

### LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [accs.glenbarry05@gmail.com](mailto:accs.glenbarry05@gmail.com).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES


### INTERNAL/ASSOCIATED THIRD PARTIES


Other companies owned to associated to Glen Barry Limited.





## YOUR LEGAL RIGHTS


If you are an EU resident, you have the right to:


 Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

 Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

 Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

 Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground, as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

 Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information

which you initially provided consent for us to use or where we used the information to perform a contract with you.



Withdraw consent at any time where we are relying on consent to process your personal data. 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.



Request deletion of any personal data we collected from you. If it is necessary for us to maintain the personal data for certain purposes, we are not required to comply with your deletion request. If we determine that we will not delete your personal data when you request us to do so, we will inform you and tell you why we are not deleting it.

## CHANGES TO THIS PRIVACY NOTICE

Any changes to this privacy notice will be posted to this website so you are always aware of the information we collect and how we use it. Accordingly, please refer back to this website frequently as this privacy notice may change.