

## **1. INTRODUCTION**

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This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We hope the following sections will answer any questions you have but if not, please do get in touch with us at:

**Compliance Officer**  
**Signbox Ltd**  
**Unit 3**  
**Egham Business Village**  
**Crabtree Road**  
**Egham**  
**TW20 8RB**

From time to time, we'll need to update this Privacy Notice and we'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish. When you are using the Signbox websites, Signbox Ltd is the data controller.

## **2. ABOUT SIGNBOX LTD**

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UK-based Signbox Ltd is a leading signage specialist with over 30 years' industry experience. With intelligent design and application, the company consistently delivers awardwinning visual communication strategies via traditional and pioneering signage methods across a number of market sectors, including corporate, education, healthcare, retail, hotel, and leisure.

Signbox Ltd is associated with the following businesses:  
Smart Poster Ltd

### 3. EXPLAINING THE LEGAL BASIS WE RELY ON

The law (including the latest requirements placed on us by the General Data Protection Regulation – GDPR) on data protection sets out a number of different reasons for which we may collect and process your personal data, including:

#### CONSENT

In specific situations, we can collect and process your data with your consent.  
*For example, when you tick a box to receive email newsletters.*  
When collecting your personal data, we'll always make clear which data is necessary in connection with a particular service.

#### CONTRACTUAL OBLIGATIONS

In certain circumstances, we need your personal data to comply with our contractual obligations.  
*For example, if you order an item from us for delivery, we'll collect your address details to deliver your purchase and pass them to our courier.*

#### LEGAL COMPLIANCE

If the law requires us to, we may need to collect and process your data.  
*For example, we can pass on details of people involved in fraud or other criminal activity affecting us to law enforcement agencies.*

#### LEGITIMATE INTEREST

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business, and which does not materially impact your rights, freedom, or interests.  
*For example, we will use your purchase history to send you or make available further offers. We may also combine the transaction history of many customers to identify trends and to develop new products/services. We will also use your name and address details to send you direct marketing information by post, telling you about products and services that we think might interest you.*

## 4. WHEN DO WE COLLECT YOUR PERSONAL DATA?

- When you visit any of our websites and use your account to buy products and services.
- When you make an online purchase and check out as a customer (in which case we just collect transaction-based data).
- When you create an account with us.
- When you purchase a product or service by phone and email but don't have (or don't use) an account.
- When you engage with us on social media.
- When you download or install one of our apps.
- When you contact us by any means with queries, complaints etc.
- When you ask one of our employees to email you information about a product or service.
- When you've given a third-party permission to share with us the information, they hold about you.
- We collect data from publicly available sources (such as planning permission) when you have given your consent to share information or where the information is made public as a matter of law.
- When you use our car park which has a CCTV system operated for the security of both customers and employees. This system may record your image during your visit.
- When you enter our office and register as a visitor.
- When you call our office, conversations may be recorded for training and quality purposes.

## 5. WHAT SORT OF PERSONAL DATA DO WE COLLECT?

If you have a web account with us: your name, gender, billing/delivery address, orders and receipts, email and telephone number. For your security, we'll also keep an encrypted record of your login password.

- Details of your interactions with us online or by using one of our apps.  
*For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, products you show interest in, web pages you visit and how and when you contact us. Details of your shopping preferences.*
- Details of your visits to our websites or apps, and which site you came from to ours. Information gathered by the use of cookies in your web browser.  
[Learn more about how we use cookies and similar technologies](#)
- Your comments and product reviews.
- Your image may be recorded on CCTV when you visit our office.
- Your car number plate may be recorded at our car park when you visit our office.
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions, or feedback.

## 6. HOW AND WHY DO WE USE YOUR PERSONAL DATA?

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

If you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

*For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.*

Here's how we'll use your personal data and why:

- To process any orders that you make by using our websites or apps. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations. For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.
- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites.

We'll do all of this as part of our legitimate interest.

*For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent logins from unexpected locations.*

- To protect our customers, premises, assets, and employees from crime, we operate CCTV systems in our office and car park which record images for security. We do this on the basis of our legitimate business interests.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.
- With your consent, we will use your personal data, preferences, and details of your transactions to keep you informed by **email, web, text and telephone** about relevant products and services. You are free to opt out of hearing from us by any of these channels at any time.
- To send you relevant, personalised communications **by post** in relation to updates, products, and services. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

- To send you communications required by law, or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To display the most interesting content to you on our websites or apps, we'll use data we hold about your favourite products. We do so on the basis of your consent to receive app notifications and / or for our website to place cookies or similar technology on your device.

*For example, we might display a list of items you've recently looked at or offer you recommendations based on your purchase history and any other data you've shared with us.*

- To develop, test and improve the systems, services, and products we provide to you. We'll do this on the basis of our legitimate business interests. For example, we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having.
- To comply with our contractual or legal obligations to share data with law enforcement. For example, when a court order is submitted to share data with law enforcement agencies or a court of law.
- To send you feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

You are free to opt out of receiving these requests from us at any time by updating your preferences in your online account or by unsubscribing from our communication.

- To build a rich picture of who you are and what you like, and to inform our business decisions, we'll combine data captured from across the company, third parties and data from publicly available lists as we have described in the section What Sort of Personal Data do we collect? We'll do this on the basis of our legitimate business interest.

*For example, by combining this data, this will help us personalise your experience and decide which content to share with you.*

Sometimes we'll need to share your details with a third party who is providing a service (such as delivery couriers). Without sharing your personal data we'd be unable to fulfil your order.

## 7. COMBINING YOUR DATA FOR PERSONALISED DIRECT MARKETING

We want to bring you offers and promotions that are most relevant to you. For this purpose, we combine the data that we collect directly from you with data that we obtain

from third parties to whom you have given your consent to pass that data onto us – such as a planning application.

## 8. HOW WE PROTECT YOUR PERSONAL DATA?

We will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites and apps using https:// technology.

Access to your personal data is password-protected. Sensitive data such as payment card information is secured by [Sage](#) to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks. We carry out penetration testing to identify ways to further strengthen security.

## 9. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

Whenever we collect or process your personal data and we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period your data will be deleted completely.

*For example, customer data retention periods include:*

### ORDERS

When you place an order, we'll keep the personal data you give us for ten years so we can comply with our legal and contractual obligations.

### INACTIVE ACCOUNTS

*If you've not used your account for more than ten years, it will be flagged as inactive, and we'll contact you to ask whether you want to keep it open. Unless you reply to say 'yes', we'll close the account and delete the personal data associated with it.*

### WARRANTIES

*If your order included a warranty the associated personal data will be kept until the end of the warranty period.*

## 10. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We sometimes share your personal data with trusted third parties.

*For example, delivery couriers or, third-party technicians visiting your premises.*

### HERE'S THE POLICY WE APPLY TO THOSE ORGANISATIONS TO KEEP YOUR DATA SAFE AND PROTECT YOUR PRIVACY:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times. If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

### EXAMPLES OF THE KIND OF THIRD PARTIES WE WORK WITH ARE:

- IT companies who support our website and other business systems.
- Sub-contract installation contractors.
- Companies such as delivery couriers.
- Direct marketing companies who help us manage our electronic communications with you.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. See our Cookies Notice for details.

### SHARING YOUR DATA WITH THIRD PARTIES FOR THEIR OWN PURPOSES:

We will only do this in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement agencies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may, from time to time, expand, reduce or sell the Company and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

To help personalise your journey through our websites we currently use the following companies who may process your personal data as part of their contracts with us:

- Google
- Twitter
- Pinterest
- Instagram
- YouTube
- Facebook
- LinkedIn
- Campaign Monitor
- Vimeo

## 11. WHERE YOUR PERSONAL DATA MAY BE PROCESSED?

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Your data is processed in the UK.

## 12. WHAT ARE YOUR RIGHTS OVER YOUR PERSONAL DATA?

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### YOU HAVE THE RIGHT TO REQUEST:

- Access to the personal data we hold about you.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact us to request to exercise these rights at any time as follows:

To ask for your information please contact

*Compliance Officer  
Signbox Ltd  
Unit 3  
Egham Business Village  
Crabtree Road  
Egham  
TW20 8RB  
or email [complianceofficer@signbox.co.uk](mailto:complianceofficer@signbox.co.uk)*

To ask for your information to be amended please update your online account or contact our customer services team.

If we choose not to action your request, we will explain to you the reasons for our refusal.

### YOUR RIGHT TO WITHDRAW CONSENT

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### WHERE WE RELY ON OUR LEGITIMATE INTEREST

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### DIRECT MARKETING

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels.

### CHECKING YOUR IDENTITY

To protect the confidentiality of your information we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act



### 13. HOW CAN YOU STOP THE USE OF YOUR PERSONAL DATA FOR DIRECT MARKETING?

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There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from us.
- If you have an account, log in into your account, visit the 'My Account' area and change your preferences.
- In our apps, you can manage your preferences and opt out from one or all of the different push notifications by selecting or deselecting the relevant options in the 'Settings' section.
- Write to Compliance Officer:  
Signbox Ltd  
Unit 3  
Egham Business Village  
Crabtree Road  
Egham  
TW20 8RB  
or email [complianceofficer@signbox.co.uk](mailto:complianceofficer@signbox.co.uk)

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.