

Welcome to the Strata Tiles privacy notice.

Strata Tiles respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our Site and your rights in relation to that personal information.

1. IMPORTANT INFORMATION AND WHO WE ARE
2. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT
3. HOW WE USE YOUR PERSONAL DATA
4. DISCLOSURES OF YOUR PERSONAL INFORMATION BY US
5. INTERNATIONAL TRANSFERS OUTSIDE OF EUROPE
6. DATA SECURITY AND LINKS TO OTHER WEBSITES
7. THE PERIODS FOR WHICH WE RETAIN YOUR PERSONAL INFORMATION
8. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION
9. IMPORTANT INFORMATION AND WHO WE ARE

1. PURPOSE OF THIS PRIVACY NOTICE

Strata Tiles (we, our or us) are committed to protecting and respecting your privacy.

This Privacy Policy explains why and how we will use the personal information that we have obtained from you or others, with whom we share it and the rights you have in connection with the information we use. Please read the following carefully.

This policy describes the way we handle and use the personal information that we obtain from all the different interactions you may have with us as a business, including when you visit our store, social media pages or website currently located at www.stratatiles.co.uk (Site) or when you contact us or take part in any of our competitions or promotions.

CONTROLLER

Strata Tiles as an organisation is the controller in relation to the processing activities described below. This policy describes why and how your personal information is processed.

If you have any questions about this privacy notice, including any requests to exercise your data subject rights, further explained below in section 9 to this policy 'Your Legal Rights', please contact us.

- Full name of organisation: Strata Tiles (part of Topps Tiles Plc and group companies)
- Name or title of: The Data Protection Officer
- Email address: gdpr@toppstiles.co.uk
- Postal address: Topps Tiles, Thorpe Way, Grove Park, Enderby, Leicester, LE19 1SU
- Telephone number: 0116 282 8000

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). We do encourage you to first raise any concerns with our data protection officer that you may have so we can seek to resolve these with you direct.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our Site and/or by contacting you by email. Any changes will take effect 7 days after we post the modified terms on our Site or after the date we notify you by email. We recommend you regularly check this page for changes and review this policy each time you visit our Site.

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. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

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).

How we collect it from you

You may give us identity, contact, transaction, profile, usage, business, financial, marketing and communications data by filling in forms on our Site, purchasing a product from us online or in store, by corresponding with us by post, phone, email, SMS or by the filling in of data capture forms in store or by a member of our staff on your instruction. This includes personal data you provide when you:

- buy, place an order for or receive a quotation for our products or services;
- receive a refund on our products;
- create an account on our Site;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us some feedback;
- use an online service ;
- request an e-receipt;
- request information following a sample purchase or quote;
- sign up to receive press releases or investor alerts;
- contact our customer services team;
- make an enquiry direct to our store (e.g. via phone);
- leave an online customer review of our products or service
- arrange a consultation;
- sign up for a credit account or apply for interest free credit;
- request a quotation;
- attend a showroom event or training day;

Personal information that you give to us

We collect the following information if you choose to give it to us:

- your name, title and contact details (email address, telephone number, postal address, delivery address, change of address information, social media handle), enquiry details, your opinion of our products, your comments on them and services, ;
- your payment card information and amount spent in store or on line;
- in relation to certain refunds, your bank account details;

we will also keep a record of your business name, business email address, telephone numbers, business or elected postal address, site address, focus of work, nature of business, logo, skills and training, and VAT Registration number, business type, industry sector, number of employees and credit limit.

If you do not provide this information to us we may not be able to contact you and/or resolve your queries effectively.

Personal information that we collect about you

When you visit our Site we automatically collect:

- The internet protocol (IP) address of your device and details regarding the type of device and browser software you use to access the Site, time zone setting and location, browser plug-in types and versions, page information, operating system and platform and other technology on the devices you use to access the Site;
- details of your use of our Site, namely traffic data, weblogs and statistical data, including where and when you clicked on certain parts of our Site and details of the webpage from which you visited it;
- details regarding when and how you consented to receive marketing communications from us (including the time and date you provided your consent); and
- cookie, (for more information please see our Cookie Policy).
- If you do not provide this information, you may be unable to access some or all of the Site or its features.

Aggregated data

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 aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

3. HOW WE USE YOUR PERSONAL DATA

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy.

3.1. 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 on 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 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 at the bottom of this page.

3.2. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

As described above, if we specifically request your permission to send (or you specifically ask us to send) you newsletters, marketing material or to notify you of special events, offers, promotions, competitions or new products and services by email, SMS, post or phone (as you indicate), we rely on your consent to do so. If you do not wish to receive communications from us, please inform us by using the unsubscribe link at the foot of the email by using the STOP code within the SMS, by using our preference portal or by contacting us in store.

Otherwise we process your personal information for direct marketing purposes on the basis that it is necessary for us to pursue our legitimate interests as a business (see above in this section for further details). We try to tailor and personalise any marketing communications that we send to you, for example, by notifying you of products, services, offers or promotions that apply to your interests, purchases, location and previous engagement with us. If you do not wish to receive marketing communications from us, you can opt-out at any time by using the unsubscribe link at the foot of the email by using the STOP code within the SMS (to unsubscribe from marketing emails post or SMS messages) by using our preference portal or by contacting us in store .

Existing or prospective customers may receive marketing via phone call. Customers' phone numbers will be screened against the telephone preference service and any phone numbers which match our customers suppressed from our marketing lists; in this case the processing is on the basis of our legitimate interests. Customers may however, update their phone marketing preference in store or using our online preference portal if they wish for this to be different to the telephone preference service; in this case the processing is on the basis of consent.

If you opt-out of receiving marketing communications from us, we keep your contact details on our suppression list for a defined period to ensure that we comply with your wishes.

After opting out of marketing communications, please note that you may still receive communications for up to 28 days due to marketing campaigns which are already in progress (e.g. being printed).

Where you opt out of receiving these marketing messages, this will not apply to email receipts.

3.3 COOKIES

Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Site may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

4. DISCLOSURES OF YOUR PERSONAL INFORMATION BY US

We only disclose your personal information outside our business in limited circumstances. If we do, we will put in place a contract that requires recipients to protect your personal information, unless we are legally required to share that information. Any contractors or recipients that work for us will be obliged to follow our instructions. We do not sell your personal information to third parties.

We may disclose your information to our trusted third party service providers, agents and subcontractors (Suppliers) for the purposes of providing services to us or directly to you on our behalf, including the operation and maintenance of our Site, and social media pages. All Suppliers 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.

Our Suppliers can be categorised as follows:

- Recipient / relationship to us Industry sector (& sub-sector) Location
- Advertising, PR, digital and creative agencies Media (Advertising & PR) EEA
- Banks, payment processors and financial services providers Finance (Banking & Payment Processing) EEA
- CCTV administration and monitoring service providers Surveillance (CCTV) EEA
- Cloud software system providers, including database, email and document management providers IT (Cloud Services) EEA & USA
- Customer care/services providers Customer Services (Support) EEA
- Delivery and mailing services providers Logistics (Delivery Service) EEA
- Facilities and technology service providers including scanning and data destruction providers IT (Data Management) EEA
- Health and safety claims administrators and consultants Health & Safety (Claims) EEA
- Insurers and insurance brokers Insurance (Underwriting & Broking) EEA
- Legal, security and other professional advisers and consultants Professional Services (Legal & Accounting) EEA
- Market and customer research providers Media (Market Research) EEA
- Social media platforms Media (Social Media) EEA & USA
- Website and data analytics platform providers IT (Data Analytics) EEA & USA
- Website and App developers IT (Software Development) EEA
- Website hosting services providers Website hosting services providers IT (Hosting) EEA
- Wifi and other communication service providers IT (Telecommunications) EEA

We may disclose the personal information to other third parties as follows:

Any third party who is restructuring, selling or acquiring some or all of our business or assets or otherwise in the event of a merger, re-organisation or similar event; and if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or request, including by the police, courts, tribunals or regulators.

5. INTERNATIONAL TRANSFERS OUTSIDE OF EUROPE

Except in a limited number of cases, we do not transfer your personal information outside of Europe. Where we do, we take measures to protect your personal information.

Some of the information you provide to us may be transferred to countries outside the European Economic Area (EEA), usually because some of our Suppliers are based outside of the EEA. These

countries may not have similar data protection laws to the UK. The non-EEA countries to which we transfer your personal data are listed in the table under Disclosure of your personal information by us. For example, we transfer your personal information to the USA when using our email marketing services provider, certain data analytics providers and most social media platforms.

Where we transfer your information outside of the EEA in this way, we take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected in the ways required by data protection law as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy or access to the relevant documents.

6. DATA SECURITY AND LINKS TO OTHER WEBSITES

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to our Site may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information.

We employ security measures to protect the personal information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage. When we have provided (or you have chosen) a password or pin allowing you access to certain parts of the Site, you are responsible for safeguarding it and keeping it confidential and you promise not to allow it to be used by third parties. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information during its transmission to us online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

Our Site and social media pages may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We are not responsible for the privacy policies and practices of other websites (even if you access them using links that we provide) and we provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

In addition, if you linked to our Site from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

7. THE PERIODS FOR WHICH WE RETAIN YOUR PERSONAL INFORMATION

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. Different retention periods apply for different type of personal information further details on this are available in our Data Retention Policy which you can request here.

8. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to verify your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where no such information is required, after we have received full details of your request. Please see the sections below to find out more about these rights

- to be informed about the processing of your personal information (this is what this statement sets out to do)
- to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- to object to processing of your personal information
- to withdraw your consent to processing your personal information
- to restrict processing of your personal information
- to have your personal information erased
- to request access to your personal information and information about how we process it
- to electronically move, copy or transfer your personal information in a standard, machine-readable form (known as portability)
- rights relating to automated decision making, including profiling
- If you wish to exercise any of the rights set out above, please use the following link <https://www.stratatile.co.uk/contact-us>.

Lawful basis

Summary of use

Where you have provided CONSENT

We may use and process your personal information for the following purposes where you have consented for us to do so • to contact you via email SMS, post and phone (as you have indicated) with marketing information about our products and services (see Marketing for further details); • to supply brochures, marketing or other material you have specifically requested from us. You may withdraw your consent for us to use your information in any of these ways at any time. Please see Your rights in relation to your personal information for further details.

Where it is necessary for us to pursue a LEGITIMATE INTEREST

- We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business for the following purposes: Processing necessary for us to promote our business and products and services and measure the reach and effectiveness of our campaigns
- for analysis and insight conducted to inform our marketing strategies, and to enhance and your visitor experience;
- to tailor and personalise our marketing communications based on your attributes;
- to supply your details to social media and other online platforms operated by other companies for them to contact you with our targeted advertising online, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please

refer to the information provided in the help pages of the platforms on which you receive advertising from us;

- to identify and record when you have received, opened or engaged with our Site or electronic communications (please see our Cookie Policy for more information);
- to contact you by email SMS post or phone with marketing information about our products and services. We will use your personal information to tailor or personalise the marketing communications you receive to make them relevant to you. Please see further the Marketing section below;
- in some cases we may use automated methods to analyse, combine and evaluate information that you have provided to us. We collect and analyse this information in this way so that we can deliver the most appropriate customer experience to you by tailoring and making relevant all our service and communications.
- to respond to correspondence you send to us Processing necessary for us to respond to changing market conditions and the needs of our customers and users
- to analyse, evaluate and improve our products and services so that your visit and use of our Site, social media pages, in store services (we will generally use data amalgamated from many people so that it does not identify you personally); and
- to undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a Customer. Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively
- to administer our Site and our social media pages and for internal operations, including troubleshooting, testing, statistical purposes;
- for the prevention of fraud and other criminal activities;
- to verify the accuracy of data that we hold about you and create a better understanding of you as an account holder or customer;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- for the purposes of corporate restructure or reorganisation or sale of our business or assets;
- for efficiency, accuracy or other improvements of our databases and systems, for example, by combining systems or consolidating records we hold about you;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings;
- to inform you of updates to our terms and conditions and policies; and
- for other general administration including managing your queries, complaints, or claims, and to send service messages to you.

Where necessary for us to carry out PRE-CONTRACTUAL STEPS you have requested or for the performance of our CONTRACT

- We will use your personal information where this is necessary for us to perform our contract with you or to carry out any pre-contract steps you've asked us to so that you can enter into that contract, for the following purposes:
- to register you as a new customer or supplier;
- to process, fulfil and complete your orders, purchases and other transactions entered into with us and deliver your order including issuing e-receipts;
- to order goods and services from you and to process payments to you or your third party at your request
- to process your payment card or bank details when taking payment for your orders or when providing a refund; and
- to arrange third party delivery
- to run our competitions and promotions that you enter from time to time and to distribute prizes.

Where processing is in your VITAL INTERESTS

We use your personal information where this is in your vital interest for the following purposes: • to notify you of any product safety or product recall issues.

Where necessary to comply with our LEGAL OBLIGATIONS

We will use your personal information to comply with our legal obligations: • to keep a record relating the exercise of any of your rights relating to our processing of your personal information; • to take any actions in relation to health and safety incidents required by law; and • to handle and resolve any complaints we receive relating to the services we provide.