

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.

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.

If you have any comments or wish to complain, please visit www.surelight.com or contact us anytime.

How we store and process your data

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers, for tax purposes. In some circumstances you can ask us to delete your data: see below for further information. We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your account data can be collected, stored and processed within the UK & Ireland only. Your data will be stored as described here or until you request removal of your personal data from our system. Please note that we will be unable to carry out your request to be removed if there are still any open transactions against your account. In order to provide updates and offers that may be of interest to you, we use recognised third parties to take payment, manage our company accounts and provide banking services. We will store transactions, payment (this does not include payment card data) and order data for up to 7 years, or for as long as required by UK financial authorities and company regulations. These third parties may operate outside the EU.

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email, post or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful reason, depending on the specific purpose for which we are using your data. Please email us if you need details about the specific legal reason 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
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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/services
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business

Purpose/Activity	Type of data	Lawful basis for processing
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(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
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

We will only use your personal data for the purposes for which we 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 find out more about how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal grounds of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

Marketing communications

You will receive marketing communications from us if you have:

- (i) requested information from us or purchased goods or services from us; or
- (ii) if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- (iii) in each case, you have not opted out of receiving that marketing.

You can ask us or third parties to stop sending you marketing messages at any time by emailing us. Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled.

We will comply with the Data Protection Act 1998 and the GDPR [2018] in the way we use and share your personal data. Amongst other things, this means that we will only use your personal data:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for these purposes

We will process your personal data ourselves as the data processor. We will take reasonable precautions to safeguard the personal information that you supply.

Surelight Ltd “will” from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about goods and services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

Third parties

Your data is not shared with any third parties other than as described here:

- * The data you submit during the purchase of your product.
- * By giving consent during the purchase of your product to send you marketing information about goods and services, that they think you may be interested in, as well as account management or, relationship management purposes.

In addition we may have to share your personal data with the parties set out below for the purposes set out in the table above:

- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

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 such data. 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. We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours.

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

If you have any queries or concerns about your data usage please contact us.

Legitimate interests

Under the Data Protection Act, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).

Contacting us, exercising your information rights and complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: The Data Protection Officer at www.surelight.com. We will process Subject Access Requests (SARs) within 30 days, SAR responses are usually free but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.