

# THE GLASGOW PRAM CENTRE LIMITED

## PRIVACY NOTICE

### 1 Who we are

We are The Glasgow Pram Centre Limited (**the Pram Centre**), a company incorporated in Scotland with registered number SC282682 and having its registered office address at 25-29 McFarlane Street, Glasgow, Scotland, G4 0TL.

We are a **data controller** for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) and related data protection legislation.

### 2 How to contact us

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

- By post: Glasgow Pram Centre, 25 - 29 McFarlane Street, Glasgow, G4 0TL
- By phone: +44 (0)141 552 3998 (and press option 1)
- By email: sales@pramcentre.co.uk
- Online: <https://www.pramcentre.co.uk/contact-us-i3>

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.

### 3 Privacy Information

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

This version of our privacy notice was last updated in April 2019.

### 4 To whom does this privacy notice apply?

This privacy notice applies to:

- **Website visitors:** all individuals who visit our website [www.pramcentre.co.uk](http://www.pramcentre.co.uk) (or any other domain name registered in our name) (the **Website**);
- **Visitors:** all individuals who visit our showroom at our premises or who access our carpark or other parts of our premises;
- **Registered online customers:** all individuals who create an online account on our Website;
- **Customers:** all individuals who enquire about our products, purchase our products or are otherwise existing, former or prospective customers of the Pram Centre;

- **Business contacts:** all individuals who are our business contacts where you or your organisation supply goods or services to us, provide professional services, have expressed an interest in us or have any other business relationship with us (including where your organisation is a public authority, an industry body or regulatory authority or similar).

This privacy notice does not apply to employees, workers or other staff of the Pram Centre. We have a separate privacy notice for such purposes. This privacy notice also does not apply to directors or shareholders of the Pram Centre.

## 5 Information about our Website

Our Website 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 we 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.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the 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 the Website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Notice](#).

## 6 Children

Our Website is not intended for children and we do not knowingly collect any personal data relating to children.

## 7 About the personal data that we collect and process

**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**).

**Special categories of personal data** 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.

We do not intentionally obtain either special categories of personal data or information about **criminal convictions and offences** about you.

The table set out in SCHEDULE 1 summarises the personal data we collect and process, how we use it (**our processing purposes**) and why we use it (**the lawful bases of processing**).

We also collect, use and share **Aggregated Data** such as statistical or demographic data relating to use of our Website. 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 feature of, or specific product offered via, our Website. 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.

## 8 How is your personal data obtained?

We use different methods to collect personal data from and about you including through:

- **Direct interactions generally.** You may give us your identity, contact, financial, transactional or similar personal data when you visit us in person or when you correspond with us by post, phone, e-mail, social media or otherwise, including when you complete a form on our Website or otherwise contact us via our Website.
- **Direct interactions with customers (including registered online customers).** You may give us your identity, contact, financial, transactional and other personal data when you:
  - enquire about our products;
  - order our products online or by telephone;
  - purchase our products in-store;
  - request marketing to be sent to you or sign up to our e-mail newsletter;
  - participate in a competition;
  - purchase a gift voucher; or
  - give us some feedback or provide a review.
- **Direct interactions with business contacts.** You may give us your identity, contact, financial, transactional and other business related personal data when:
  - you or your organisation enquire about our products; or
  - you or your organisation negotiate and/or enter into a contract or purchase order with us; or
  - you or your organisation provide services or products to us; or
  - you provide us with your business card.
- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - where you are a business contact, your organisation or business may provide us with your identity, contact and employment data and we may receive information from third party references or from professional advisers.
  - we may obtain identity and contact from publicly available sources such as social media (such as Facebook, LinkedIn or Twitter), Companies House or other organisations' websites.
  - we may obtain contact, financial and transactional data from providers of payment and credit card services or from providers of delivery services.

- we may obtain technical data (relating to the use of our Website) from analytics providers or search information providers.
- **CCTV images.** We operate CCTV cameras in our showroom, store premises and carpark and therefore we will capture images of any visitors to our store as well as users of our carpark.

## 9 **Failure 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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## 10 **Marketing**

We have a regular e-mail newsletter (containing information about our products and special offers or promotions) and we occasionally run competitions to win one of our products.

If you are a customer (including a prospective customer), we will only provide you with direct marketing communications where you have consented to receive such communications or you have contacted us directly to request specific information about our products. You can subscribe to such marketing communications, and you can adjust your marketing preferences at any time by contacting us using the contact details above at paragraph 2 ([How to contact us](#)).

If you represent another business (you are a business contact), we may provide you with direct marketing communications (by e-mail, post or telephone) where we feel that this may be relevant to your business (provided that you have not opted out of such communications). When we use your personal data for such purposes, we do so on the basis that it is in our legitimate interests to pursue direct marketing, provided that it constitutes fair processing of your personal data to do so.

You can also **opt-out** or **unsubscribe** from all or some of these marketing communications at any time by contacting us using the contact details above at paragraph 2 ([How to contact us](#)) or by clicking “unsubscribe” at the bottom of any marketing e-mail.

Where you opt out of receiving these marketing communications, this opt-out will not apply to personal data provided to us for any other purpose.

## 11 **With whom do we share your personal data?**

There may be circumstances in which we may also need to share your personal data with certain third parties (strictly on a confidential, business need-to-know basis). The third parties to which we may transfer your personal data include:

- Where you are a business contact, your business or organisation, for the purpose of receiving products or services from your business or organisation or otherwise.
- Service providers acting as processors who provide IT and system administration services (including website designers and managed IT and/or outsourced IT service providers).
- Professional advisers including lawyers, accountants, auditors and insurers who provide consultancy, legal, insurance and accounting services.
- Our banks and financial advisors who provide banking and financial services.

- Our product suppliers and partner companies where relevant to the products that you purchase from us (for example, for warranty claim purposes).
- Delivery service providers (including DPD Local UK Limited) who will deliver products ordered in-store or on our online shop.
- Drop-shipping companies (including Kidsmill and Kim's Baby Equipment) who will deliver or arrange delivery of products ordered on our online shop directly to customers.
- Payment or credit card service providers, including electronic point of sale systems in-store (Opus Retail Solutions Ltd) and merchant services in-store and online (Barclaycard and First Data).
- Any relevant regulatory authority or law enforcement agency, including HM Revenue & Customs, courts or tribunals who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then 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.

Any sharing of your personal data will only take place either where we are legally obliged to do so, where it is necessary for the performance of a contract with you or where it is in our legitimate interests to do so, including as follows:

- to maintain network and information security;
- to provide products to our customers and to managed customer relationships;
- to develop and improve our products and product range in order to remain competitive;
- to ensure adequate financing of our business;
- to establish, protect and defend our legal rights;
- to pursue our commercial objectives where this does not override your rights and freedoms as a data subject.

## 12 International transfers

We generally do not transfer your personal data out of the European Economic Area (**EEA**). However, whenever we are required to transfer your personal data out of the EEA (for example where a third party supplier is located outside of the EEA), we ensure a similar degree of protection is afforded to it by ensuring that:

- your personal data is only transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- appropriate safeguards (including use of specific data protection contracts approved by the European Commission or ICO) are implemented; or
- one of the permitted derogations set out in Article 49 of the GDPR applies, including your explicit consent to the transfer of your personal data.

### 13 **Automated decision making and profiling**

We do not use automated decision-making (including profiling) to make any decisions which would produce a legal effect or similarly significantly affect a data subject.

### 14 **How long do we retain your personal 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.

For tax purposes, we retain basic information about our customers (including identity, contact, financial and transactional data) for six years after they cease being customers. Please contact us using the contact details above at paragraph 2 ([How to contact us](#)) for further details about our retention periods.

### 15 **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 the Information Commissioner's Office of a breach where we are legally required to do so.

### 16 **Your rights**

Your personal data is protected by legal rights, which include your rights 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. 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, following 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 on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

- **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: if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; 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 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 (data portability).** 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights, please contact us using the contact details above at paragraph 2 ([How to contact us](#)).

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.

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.

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.

You also have the right to complain to the Information Commissioner's Office, which regulates the processing of personal data, about how we are processing your personal data.

## SCHEDULE 1

Personal data will be processed by us where you consent to the processing or where that processing is necessary for 1) the performance of a contract with you; or 2) compliance with a legal obligation to which we are subject; or 3) the purposes of our legitimate interests (or those of a third party).

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 using the contact details above at paragraph 2 ([How to 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 below.

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
<p><b>Website visitors</b></p> <ul style="list-style-type: none"> <li>any visitor to our Website</li> </ul>	<p>Technical data (including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website)</p> <p>Usage data (including information about your visit and how you use our Website)</p>	<p>To improve the user experience and administer the functionality of our website.</p> <p>To respond to general and specific enquiries.</p>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to maintain network security and Website relevance for visitors to our Website)</li> </ul>
<p><b>Visitors</b></p> <ul style="list-style-type: none"> <li>any visitor to our showroom, store premises, carpark and other parts of our premises</li> </ul>	<p>Image data (including images captured on CCTV)</p>	<p>To ensure the safety of our customers and security of our showroom, store premises, carpark and other parts of our premises.</p>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to detect and prevent crime)</li> </ul>
<p><b>Registered online customers</b></p> <ul style="list-style-type: none"> <li>any individual who creates an account on our Website</li> </ul>	<p>Identity data (including full name)</p> <p>Contact data (including home address, billing address, delivery address, email address and</p>	<p>To register you as a new online customer.</p> <p>To manage your online account with us.</p> <p>To process and deliver products to you (see</p>	<ul style="list-style-type: none"> <li>Performance of a contract with you</li> </ul>

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
	<p>telephone numbers)</p> <p>Transaction data (including information obtained by providing products to you, details about products provided by us to you, details of payments to and from you, and other details of our interactions including correspondence and conversations)</p> <p>Financial data (including bank account or credit card details and payment details)</p> <p>Marketing and communications data (including your preferences in receiving marketing from us and your communication preferences)</p>	"Customers" below for further details)	
<p><b>Customers</b></p> <ul style="list-style-type: none"> <li>any individual who purchases our products or is otherwise an existing, former or prospective customer of the Pram Centre</li> <li>includes any individual who creates a customer payment account with us in-store for the purposes of paying a deposit on one or more products (with payment in full on delivery)</li> </ul>	<p>Identity data (including full name)</p> <p>Contact data (including home address, billing or delivery address, email address and telephone numbers)</p> <p>Transaction data (including information obtained by providing products to you, details about products provided by us to you, details of payments to and from you, and other details of our interactions including correspondence and conversations)</p> <p>Financial data (including bank account or credit card details and payment details)</p>	<p>To process and deliver products and services to you including:</p> <p>(a) providing information about our products on request;</p> <p>(b) providing, selling and delivering our products;</p> <p>(c) managing payments, fees and charges, including managing credit or debit card payments (in-store and online) and managing deposits and payments in instalments;</p> <p>(d) collecting and recovering money owed to us;</p> <p>(e) dealing with product returns or product</p>	<ul style="list-style-type: none"> <li>Performance of a contract with you</li> <li>Necessary for our legitimate interests (to respond to your correspondence with us, to keep our records up to date, to recover debts due to us and to manage customer relationships)</li> <li>Necessary to comply with a legal obligation</li> </ul>

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
	<p>Marketing and communications data (including your preferences in receiving marketing from us and your communication preferences)</p>	<p>recalls;</p> <p>(f) dealing with any customer complaints and receiving feedback;</p> <p>(g) where you have provided your e-mail address for this purpose, sending an e-receipt for your purchase;</p> <p>(h) corresponding with you in connection with our products, including without limitation informing you of any ordered products arriving in-store, corresponding with you in connection with any deposits or payments made and (where you have provided your contact details for this purpose), informing you of any product recalls.</p> <p>To manage our relationship with you.</p> <p>To notify you about changes to our terms and conditions or our privacy notice.</p>	
<p><b>Business Contacts</b></p> <p>actual, former or prospective business contacts, including:</p> <ul style="list-style-type: none"> <li>staff or other contacts at our third party suppliers (including professional advisors)</li> <li>individuals or representatives of organisations who have expressed an interest in our business, and</li> <li>anyone else with whom we have contact in a business context</li> </ul>	<p>Identity data (including full name and title)</p> <p>Contact data (including business address, email address and telephone numbers)</p> <p>Employment data (including job title and role, employer, credentials)</p> <p>Transaction data (including details about products and services provided by you (or your organisation) to us, details of payments to and from you (or your organisation) and</p>	<p>To manage our business relationships with suppliers and sub-contractors, professional advisors, regulatory authorities, public authorities and others, which will include:</p> <p>(a) seeking or maintaining business relationships with various organisations, including regulatory authorities;</p> <p>(b) assessing the suitability of any existing or potential supplier or other business relationship;</p> <p>(c) negotiating and entering into appropriate contracts for the supply of goods or services to us, carrying out any obligations under</p>	<ul style="list-style-type: none"> <li>Performance of a contract with you (where relevant)</li> <li>Necessary for our legitimate interests (to perform a contract with your organisation, to manage third party relationships, to seek supply arrangements appropriate for our business, to run our business efficiently and profitably, to enhance, modify and improve our products and product range, and to pursue our commercial objectives where this does not override your rights and freedoms as a data subject)</li> </ul>

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
	<p>other details of our interactions including correspondence and conversations)</p> <p>Marketing and communications data (including your preferences in receiving marketing from us and your communication preferences)</p>	<p>such contracts (including obligations of payment) and if necessary enforcing any such contracts;</p> <p>(d) undertaking on-going monitoring and management of our relationship with suppliers and other professional and business contacts;</p> <p>(e) interacting with other organisations or persons (including product suppliers, professional advisors, delivery companies or sub-contractors) in the course of providing products to our customers;</p> <p>(f) investigating any complaints or enquiries.</p>	
<b>All data subjects</b>	All personal data	<p>To comply with legal obligations (such as any legislation or a court order).</p> <p>To protect our privacy, property or safety or those of a third party and your rights do not override such interests.</p> <p>To establish, exercise or defend our legal rights.</p>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to assert our legal rights)</li> </ul>

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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the contact details above at paragraph 2 ([How to contact us](#)).

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.