



# PRIVACY NOTICE

Welcome to G.B. Lighting Ltd. privacy notice.  
G.B. Lighting Ltd trades as Heathfield & Co and By Luum.

G.B. Lighting Ltd 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 contract with us, contact us or visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

A PDF version of this policy is also available here. Please also use the Glossary, at the end of this notice, to understand the meaning of some of the terms used in this privacy notice.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this privacy notice

This privacy notice aims to give you information on how G.B. Lighting Ltd treats any personal data that you give to us, or any that we may collect from, or about you. It applies to all products and services, and instances where we collect your personal data including, but not limited to, sending product enquiry emails, email marketing mailing list sign-up requests, social media interaction, purchase of a product or service, take part in a competition etc.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide 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. This privacy notice supplements the other notices and is not intended to override them.

### Controller

G.B. Lighting Ltd is the controller and responsible for your personal data (collectively referred to as "GB Lighting Ltd", "we", "us" or "our" in this privacy notice).

### Contact details

Our full details are:  
Full name of legal entity: G.B. Lighting Ltd, Company number 01343559  
Postal address: Unit 1, Priory Road, Tonbridge, Kent, United Kingdom, TN9 2AF  
Telephone number: +44 (0) 1732 350450  
Email: [dataprotection@heathfield.co.uk](mailto:dataprotection@heathfield.co.uk)

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. G.B Lighting is registered with the ICO against number ZA192334

### Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 08 May 2018. Historic versions can be obtained by contacting us.

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.

### Third-party links

This 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 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.

## Collecting data from children

We do not collect personal data from children under the age of 16 and this website is not intended for children.

## 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 follows:

- **Identify Data**, which may include first name, last name, or similar identifier, title and gender.
- **Contact Data**, which may include billing address, delivery address, email address and mobile or other telephone numbers.
- **Business Data**, such as your company name, company address, Business VAT number and Registration No.
- **Transaction Data** includes bank account and payment card details, details about payments to and from you and other details of products and services you have purchased from us directly or our Business Partners.
- **Technical Data** includes information about how you use our website, 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 this website. For more information view our Cookie Policy.
- **Usage Data** includes information about how you use our products and services (including return or warranty claims, product loans, products on display or at trade exhibition events) directly with us or our Business Partners.
- **Marketing and Communications Data**, including history of those communications, whether you open them or click on links, and information about products or events we think you may be interested in, and analysing data to help target offers or events to you that we think are of interest or relevance to you. Offers may include any of our products and events, such as invites to our sale or other trade events.
- **Other Data** or information such as if you get in touch with us or our Business Partners by phone, letter, email or online, for example customer service enquiries and/or other comments and information exchanged with our customer service team that you provide to us as a result of your request for a specific product or service. Information about you from publicly available sources, including publicly available contents on social media platforms.

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 or using a particular product or service. 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 products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time. We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

### 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, Business, Usage, Transaction and Other Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Apply for our products or services.
  - Send a product enquiry and/or catalogue/information request email to our customer services team or through our website. This may include a pre-populated subject line and recipient addresses, both of which are editable prior to sending. The quantity and range of available enquiry links will change in line with varying product ranges, limited product discounts and sales etc.
  - Request marketing material, digital or otherwise, to be sent to you. For example, the use of sign up forms to opt-in to be added to our email-marketing mailing list(s). Such forms may change location and styling on the website from time to time.
  - Enter a competition, promotion or survey; or
  - Give us some feedback.
- **From our contracted Business Partners** (third party Agents or Distributors) who we work with to provide products or services or quote to you.
- **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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - (a) Analytics providers such as Google based outside the EU;
    - (b) Search information providers based inside and outside the EU.
  - Identity and Contact Data from publicly available sources such as Companies House, Credit Reference Agencies, HMRC, the Electoral Register and other and publicly available directories based inside the EU.

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party including our Business Partners) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To develop new products and services and to review and improve current products and services.
- Analysis of web traffic to guide improvements to the user experience of the website.
- Responding to specific requests for marketing material, digital or otherwise.
- Responding to specific service and/or product queries and requests.
- Updating your records, tracing your whereabouts and recovering debt.
- To improve the operation of our business and that of our Business Partners.
- To create, register and manage your account with us. Including assessing an application for account credit terms, including payment method and the payment terms.
- Subject to your explicit consent, to send you promotional materials and other communications and information which

we think you might find useful through email, postal mail, telephone and SMS messages, and to develop and conduct targeted marketing and behavioural advertising, including through display on third party apps installed on your telephones.

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

### 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 may 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 below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>(a) To register you as a new customer or potential customer on a quotation basis.</p> <p>(b) All stages and activities relevant to managing your account including enquiry, application, administration and management of accounts.</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Business</li> <li>• Transaction</li> <li>• Marketing and Communications</li> <li>• Other</li> </ul>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (assessing an application for account credit and payment terms with us)</p>
<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Business</li> <li>• Transaction</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Other</li> </ul>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Responding to a query or request for information from you.</p> <p>(c) Asking you to leave a review or take a survey</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Business</li> <li>• Transaction</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Other</li> </ul>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Business</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Other</li> </ul>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Business</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Other</li> </ul>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p>
To use data analytics and other means to improve our website, products/ services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Business</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Other</li> </ul>	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing and product development strategy)
To make suggestions and recommendations to you about products or services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Business</li> <li>• Transaction</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Other</li> </ul>	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

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

### 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 products, services and offers may be relevant for you (we call this marketing).

You will only receive marketing communications from us if you have provided your explicit consent to receive such information, requested information from us or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express consent before we share your personal data with any company outside G.B. Lighting Ltd for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by contacting us at any time.

Where you opt out of receiving these specific email marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, submitted enquiry of various sorts, warranty registration, product/service experience or other transactions.

## Cookies

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 website may become inaccessible or not function properly. As

well as providing a cookie information pop up and opt in box when users first visit the website, we also provide a permanently accessible Cookie Policy page where users can adjust their consent levels at any time. This is available at [heathfield.co.uk/cookie-policy](http://heathfield.co.uk/cookie-policy)

### **Change of purpose**

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.

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 the parties set out below for the purposes set out in the table in paragraph 4 above.

### **Internal Third Parties**

Other companies within G.B. Lighting Ltd acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

### **External Third Parties**

- Our contracted Business Partners (for example, our Agents and Distribution Partners)
- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, debt recovery and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Credit reference and fraud prevention Agencies.
- 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.

## **6. INTERNATIONAL TRANSFERS**

We share your personal data within G.B. Lighting Ltd. This may involve transferring your data outside the European Economic Area (EEA).

Whilst we are based in the UK, many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which

give personal data the same protection it has in Europe.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. 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, contract Business Partners, 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.

## 8. DATA RETENTION

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as you have an account with us and/or we have reasonable business needs, such as managing our relationship with you and managing our operations; and/or
- For as long as we provide products and/or services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance, including Contact, Identity, Financial and Transaction Data

In some circumstances, you can ask us to delete your data: see [Your Legal rights](#) below for further information.

In some circumstances, 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.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

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 on 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 override 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.

If you wish to exercise any of the rights set out above, please contact us as per the details provided above.

#### **No fee usually required**

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.

## **10. 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/product 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.

**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.



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