

Privacy Policy & Notice

We are ILGS Ltd T/A Newbrix with registered number 03595206 and address 2 Winey Close, Chessington, Surrey, KT9 2SP. Our Data Protection Lead can be contacted at akhil@newbrix.co.uk.

We have produced this privacy notice in order to keep you informed of how we handle your personal data. All handling of your personal data is done in compliance with the UK Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 ("Data Protection Legislation").

The terms "Personal Data", "Special Categories of Personal Data", "Personal Data Breach", "Data Protection Officer", "Data Controller", "Data Processor", "Data Subject" and "process" (in the context of usage of Personal Data) shall have the meanings given to them in the Data Protection Legislation. "Data Protection Lead" is the title given to the member of staff leading our data protection compliance programme in lieu of a requirement for a Data Protection Officer.

What are your rights?

When reading this notice, it might be helpful to understand that your rights arising under Data Protection Legislation include:

- The right to be informed of how your Personal Data is used (through this notice);
- The right to access any personal data held about you;
- The right to withdraw consent at any time, by emailing hello@newbrix.co.uk;
- The right to rectify any inaccurate or incomplete personal data held about you;
- The right to erasure where it cannot be justified that the information held satisfies any of the criteria outlined in this policy, or where you have withdrawn consent;
- The right to prevent processing for direct marketing purposes, scientific/historical research or in any such way that is likely to cause substantial damage to you or another, including through profile building; and
- The right to object to processing that results in decisions being made about you by automated processes and prevent those decisions being enacted.

You can exercise your right to access personal data held about you by contacting hello@newbrix.co.uk with the subject line: "Subject Access Request". When you submit a 'subject access request', you will need to provide confirmation of your identity by including a photocopy of your driver's license or passport. This service is provided free of charge and our response will be made within thirty (30) days, unless our Data Protection Lead deems your request as being excessive or unfounded. If this is the case, we will inform you of our reasonable administration costs in advance and/or any associated delays, giving you the opportunity to choose whether you would like to pursue your request.

If you believe we have made a mistake in evaluating your request, please see the section 'Who can you complain to?'

If you have questions about any of the rights mentioned in this section, please contact our Data Protection Lead at hello@newbrix.co.uk.

Who is the Data Controller?

- If we have collected your personal data directly from you for our own purposes, we are the Data Controller.

- If we have purchased your personal data from a third-party for our own purposes, we are the Data Controller. Where we have purchased your personal data, we will contact you to let you know before we first start to use it, or, at the latest, within one month of acquiring it.
- If we have been passed your personal data from a third-party for our own purposes, we are the Data Controller. We will contact you to let you know before we first start to use it, or, at the latest, within one month of acquiring it.
- If we have been passed your personal data from a third-party for a joint purpose that we both influence, we are the joint Data Controller. We will contact you to let you know before we first start to use your data, or, at the latest, within one month of acquiring it.
- If your data has been passed to us by a third party for processing under their instruction, that third party is the Data Controller. They should have notified you that they would be passing your personal data to us, ILGS Ltd T/A Newbrix, at the time they collected your data and within their own privacy notices/standards. For a list of Data Controllers that we process personal data for, see the section 'Third Party Interests'.
- If we have received your personal data as part of a business to business relationship, the Data Controller is your employer.

What are the lawful bases for processing personal data?

Under Data Protection Legislation, there must be a 'lawful basis' for the use of personal data. The lawful bases are:

- a) 'your consent';
- b) 'performance of a contract';
- c) 'compliance with a legal obligation';
- d) 'protection of your, or another's vital interests';
- e) 'public interest/official authority'; and
- f) 'our legitimate interests'.

What are our 'legitimate interests'?

Legitimate interests are a flexible basis upon which the law permits the processing of an individual's personal data. To determine whether we have a legitimate interest in processing your data, we balance the needs and benefits to us against the risks and benefits for you of us processing your data. This balancing is performed as objectively as possible by our Data Protection Lead. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest.

About our processing of your data

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 as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.

- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, 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.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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. 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.

Processing Activities

Reference	Categories of Information	Purpose & Lawful Basis	Source
B2B Marketing	Identity Data, Contact Data	Direct marketing to former, current and prospective clients. Lawful basis: legitimate interests.	Directly obtained or by referral from existing clients/partners/suppliers.
Analytics	Technical Data, Usage Data	To understand how you use our website and improve our service. Lawful basis: legitimate interests.	Directly or indirectly obtained through a client's website.
Fraud Prevention	Identity Data, Transaction Data	To combat fraud; information shared with credit reference agencies where payments are cancelled without notice. Lawful basis: protection of vital interests.	Directly or indirectly obtained through a client's website.
Contact Submission	Identity Data, Contact Data	To store information posted on forums or blogs. Lawful basis: your consent.	Directly or indirectly obtained through a client's website.
Phone Calls	Identity Data, Contact Data	Calls may be recorded for training and/or auditing purposes. Calling Line Identification also collected. Lawful basis: legitimate interests.	Directly obtained.
Email and Web Contact	Identity Data, Contact Data	To respond to enquiries or complaints and improve our service. Lawful basis: legitimate interests.	Directly obtained or through our website.
Consumer Marketing	Identity Data, Contact Data, Transaction Data, Marketing and Communications Data	If you make a purchase, we add your contact information to our marketing list. Lawful basis: legitimate interests.	Directly obtained.

What happens if I refuse to give ILGS Ltd T/A Newbrix my personal data?

The information about you that we have collected for the performance of our contracts is required in order for us to successfully fulfil our obligations to you. If you choose not to provide the personal data requested, we will not be able to enter into a contract with you to provide the benefits we offer. If we are already processing your personal information under a contract, you must end our contractual relationship (as/where permitted) in order to exercise some of your rights.

We process some personal information as part of a contractual relationship with a Data Controller. Any requests to restrict this type of processing should be forwarded to the Data Controller; they will be responsible for discussing your concerns and making any decisions.

What profiling or automated decision making do we perform?

ILGS Ltd T/A Newbrix does not perform any profiling or automated decision making based on your personal data.

How long will your personal data be kept?

ILGS Ltd T/A Newbrix holds different categories of personal data for different periods of time. Wherever possible, we will endeavour to minimise the amount of personal data that we hold and the length of time for which it is held.

- If 'consent' is the basis for our lawful processing of your data, we will retain your data so long as both the purpose for which it was collected, and your consent, are still valid. We review the status of your consent every twelve (12) months and treat non-response to our requests for renewal of consent as if they were your request to withdraw consent. Occasionally, we might identify a legitimate interest in retaining some of your personal data obtained by consent; if we do, we will inform you and identify the interest specifically.
- Identity, Contact and Transaction Data are held indefinitely (subject to object by the individual, or individuals having left our clients' business) in order to provide a superior service to returning customers.
- If we process your data on the basis of 'legitimate interests', we will retain your data for so long as the purpose for which it is processed remains active. We review the status of our legitimate interests every twelve (12) months.
- All categories of personal data held because they are essential for the performance of a contract will be held for a period of six years, as determined by reference to the Limitations Act 1980, for the purposes of exercising or defending legal claims.

Who else will receive your personal data?

ILGS Ltd T/A Newbrix passes your data to the third parties listed in the section 'Third Party Interests' below, for the purposes of providing our services to you, and for no other purpose.

Does your data leave the EU?

ILGS Ltd T/A Newbrix uses overseas web and IT providers. Details of what data is sent where, and the safeguards in place, are included in the section 'Third Party Processors' below.

Third Party Interests

Data Controllers

Name of Third Party Controller	Processing We Perform	EU Representative (if applicable)
HMRC, regulatory authorities or other authorities	Joint Controller with these authorities who require reporting of processing in some situations.	N/A
Postal/Courier Providers	Where these providers act as Data Controller, we are joint Controller for the purposes of sending you physical documents.	N/A

Our Data Processors

Name of Third Party Processor	Purposes for Carrying out Processing
Help The Move	Utility management
DocuSign	Electronic Document Signing
Canopy	Reference agency
Alto	Database management

Who can you complain to?

In addition to sending us your complaints directly to akhil@newbrix.co.uk, you can send complaints to our supervisory authority. As ILGS Ltd T/A Newbrix predominantly handles the personal data of UK nationals, our supervisory authority is the Information Commissioner's Office. If you believe that we have failed in our compliance with data protection legislation, complaints to this authority can be made by visiting ico.org.uk.