

The Kitchen People Limited (trading as bulthaup) Privacy Policy

1. Introduction

The Kitchen People Limited (trading as bulthaup), takes privacy seriously and we are committed to ensuring that your privacy is protected.

As an indication of compliance, this policy explains when and why we collect personal information about you, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure.

2. What is the General Data Protection Regulation (GDPR) for?

GDPR relates to how we manage and protect your data and will have no impact on the services we provide to you. We are still committed to delivering market-leading kitchen design and installation in line with the ethos of our company.

3. What is personal data?

Personal data is information which directly or indirectly identifies you. At The Kitchen People Limited, we are committed to processing your personal data in line with EU data protection laws.

4. What information will we collect?

We may collect certain personal data which will aid us in delivering the requirements of our contract with you. This includes personal identity details, financial information, information given during interactions and correspondence and sensitive personal data. It's important to note we will only collect this with your permission, unless we have a legal obligation or other lawful basis to do so.

We may also request information that requires your consent. If this is the case we will set out the details of how we intend to use the data, acquire your consent and identify how you can withdraw your consent at any time. If you wish to withdraw your consent, please contact our Data Protection Team at privacy@bulthaup.co.uk

5. How we collect your personal information

When you use our products, or services, interact with us online, by phone, email or otherwise, the categories of information that we collect about you are as follows:

a. personal information you give to us:

This is information that is provided voluntarily about you, that you give to us by entering information via:

- Corresponding with us in person, by phone, email or otherwise
- Our website or our parent company website e.g. <https://bulthaup.com/en>
- Our social media accounts e.g. via Facebook, LinkedIn, Twitter or Instagram

We will seek to minimise the information we ask for to that which is needed to perform the relevant function or service at the time.

b. personal information we collect about you:

We automatically collect the following information when you interact with us: e.g. details of any personal data you provide to us, transactions you undertake with us in relation to your contract with us or any information you provide to us for marketing purposes.

We also automatically collect technical information, please see our cookie policy for further information.

c. personal information we may receive from other sources:

At times we may receive information on individuals from other sources, e.g. from a representative or other authorised contact.

If you are submitting this information as such a representative or contact, you confirm that it is true and correct and that you will not provide us with any information which constitutes personal data unless you have ensured that you have obtained all necessary consents or other legal justification and/or provided any required notices to the data subject, or that you are otherwise permitted to provide such information to us, so that we can use it for the purposes and on the bases set out in this notice.

6. How we use your personal information

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are explained below.

Where there is 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, or those of a third party, for the following purposes:

a. business functions:

For data accuracy

- to verify the accuracy of data that we hold about you;

To carry out marketing

- for marketing activities (other than where we rely on your consent to contact you by email with information about our products and services or share your details with third parties to do the same, as explained below);
- for analysis to inform our marketing strategy, and to enhance and personalise your customer experience when you buy products and services from us;

b. where it is required to complete or perform a CONTRACT with you

We may use and process your personal information where:

- we have supplied you (or continue to supply you) with any products or services, including any after sales customer service requirements;
- where you (contracting as an individual) are supplying us with products and services;
- where we have arranged for the supply of another company's products or services to you;

We will use this information in connection with the contract for the supply of products or services when it is needed to carry out that contract with you, or for you to enter into it.

c. where you have provided CONSENT

For marketing activities, in order to contact you by **email** or **telephone** with marketing information about our products and services, including customer events (except where we may rely on Legitimate Interests as described above); or to share your details with our recommended third party partners for them to do the same. Please see the marketing section (section 15) below in this policy.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see section 18 on withdrawing your consent for further details.

7. Data anonymisation and use of aggregated information

Your information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We may use this data for future product service queries and analytical purposes

8. How we store your personal information

The Kitchen People Limited has in place various procedures to protect personal information including limiting access to those employees and other third parties who have a business need to know in order to perform their employment duties and business responsibilities.

Computers and computer network systems are protected with the appropriate firewalls, encryption software, password protection. Access to the company computer network is restricted to areas required to perform business duties.

9. Others who may receive access to your personal information

We may disclose your information to our third-party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf.

Such third parties may include our appointed suppliers, our nominated delivery company, or any other appointed company or person acting on our behalf.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we require all third parties to keep your information secure and not to use it other than in accordance with our specific instructions.

If you sign up to attend one of our events, we may share your name and employer or organisation with fellow attendees and sponsors of that event for their information only, but will not share your contact details for marketing purposes without your consent.

10. Other ways we may share your personal information

We may transfer your personal information to a third party if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or our legal rights or to protect the rights, property or safety of our visitors and customers. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

11. Data protection outside the European Economic Area (EEA)

On occasion, the information you provide to us may be transferred to countries outside the European Economic Area (EEA) we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected 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.

12. How long we will keep your personal information

We keep personal information for as long as necessary to ensure we can deliver our services and in line with our business retention and disposal policy. This policy reflects legal requirements, our regulatory and compliance functions and other applicable considerations to determine the appropriate retention period.

We do not retain personal information in an identifiable format for longer than is necessary.

13. Security and links to other websites

Our website may contain links to other websites of interest. This policy does not apply to those other websites so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using any links that we may provide.

14. Cookies

Like many other websites, our website uses cookies (including Google Analytics cookies) to obtain an overall view of visitor habits and visitor volumes to our website. 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow our websites to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our Cookie Policy

15. Our marketing

We may collect and process your preferences to receive marketing information directly from us by **email** in the following ways:

- If you place an order with us for a product or service, we may contact you with marketing information relating to events or company publications, except where you indicate you would prefer otherwise.
- If you sign up to attend one of our events

From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you want to continue receiving marketing information from us.

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to us or emailing us at privacy@bulthaup.co.uk

16. Third party marketing

We will not share your personal information with any third party for marketing purposes unless we have your consent to do so.

17. Your rights

You have a number of rights in relation to your personal information under data protection law. You may request access to, change or object to processing of your personal data. In relation to these rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information.

Except in rare cases where additional time may be required, we will respond to you within one month from either (i) the date that we have confirmed your identity, or (ii) where we do not need to do this because we already have this information, from the date we received your request.

Accessing your personal information

Under data protection laws you have a legal right to ask to see a copy of the personal information that we hold about you. Such requests are called **subject access requests**.

If you would like to make a subject access request, please contact our data protection team at privacy@bulthaup.co.uk

Further information about subject access requests can be found on the Information Commissioner's website <https://ico.org.uk>

We may not provide you with a copy of your personal information if this concerns other individuals or if we have another lawful reason to withhold that information.

If you believe that any of the information we are holding on you is incorrect or incomplete, please email us as soon as possible at the above email address. We will promptly correct any information found to be incorrect.

18. Withdrawing your consent

Where we rely on your consent as the legal basis for processing your personal information, as set out in section 6 on how we use your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this policy.

If you would like to withdraw your consent or object to receiving any direct marketing to which you previously opted-in, you can do so by emailing us at privacy@bulthaup.co.uk

If you have provided consent for your details to be shared with a third party, and wish to withdraw this consent, please also contact the relevant third party in order to amend your preferences.

19. Complaining to the UK data protection regulator

We sincerely hope we are able to address all of your personal data concerns however if following your contact with our Data Protection Team, you are still unhappy you may be able to make a complaint to the Information Commissioner's Office (<https://ico.org.uk>)

20. Changes to this policy

This policy may change from time to time so please check this page occasionally to ensure that you're happy with any changes. This policy is effective from May 2018. Should you have any questions, requests or concerns relating to your personal data privacy or the information in this statement, please contact our data protection team: privacy@bulthaup.co.uk

21. Contact us

Please contact our data protection team in one of the following ways if you have any questions about this policy or about the way we process your personal information:

Please write to:

Data Protection Team Manager
Bulthaup
142-144 Holland Park Avenue
London
W11 4UE

Please email:

Data Protection Team Manager
privacy@bulthaup.co.uk