# **Privacy Policy**

Document last updated: 24th May 2018

#### PRIVACY POLICY

Timber marketing Services Unlimited (also known as Wood Concepts) will be the Data Controller of the personal data that you provide to us. Wood Concepts are committed to upholding all legislative requirements with regards to data protection and privacy. This statement will outline our privacy policy in association with this website and personal data collection & processing.

#### **Fair Processing Notice**

For some of the services & products which we offer, we may require information from you. The personal data we collect from you may include: name, address, telephone number, email address, company name and details.

The personal data we collect from you will only be used for the following purposes:

The provision of services & products

Normal communication in relation to the above services & products

Correspondence in relation to Billing and Accounts Receivable

Delivery notifications, new service offerings and service updates

To personalize your experience

To improve our website

To improve customer service

To administer a contest, promotion, survey or other site feature

To send periodic emails

By consenting to this, you are giving us permission to perform those actions. You may withdraw consent at any time by sending an email to: gdpr@tms.ie

#### Why Wood Concepts Needs to Collect and Store Personal Data

In order for us to provide you with services & products services we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

### **Definitions**

#### **PERSONAL DATA**

Under the EU's General Data Protection Regulation "Personal Data" is defined as follows:

Any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### **USAGE DATA**

"Usage Data" is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

#### **DATA CONTROLLER**

"Data Controller" means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your data.

#### DATA PROCESSOR (OR SERVICE PROVIDERS)

"Data Processor" (or "Service Provider") means any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

#### **DATA SUBJECT**

"Data Subject" is any living individual who is the subject of Personal Data.

#### **USER**

The "User" is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

#### **COOKIES**

"Cookies" are small pieces of data stored on a User's device.

### Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

### Types of Data Collected

#### **PERSONAL DATA**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include:

- First name and last name
- Email address
- Phone number
- Place of business
- · Cookies and Usage Data

If you actively consent, we may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

#### **USAGE DATA**

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

#### **LOCATION DATA**

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customise our Service.

You can enable or disable location services when you use our Service at any time, through your device settings.

#### TRACKING & COOKIES DATA

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.

### **How Wood Concepts uses cookies**

When you use and access the Service, we may place a number of cookies files in your web browser.

We use cookies for the following purposes: to enable certain functions of the Service, and to provide analytics, such as Google Analytics.

#### **GOOGLE ANALYTICS COOKIES AND IDENTIFIERS**

This Service uses Google Analytics to monitor and analyse the use of our Service. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data may be shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

Users may disable cookies or delete any individual cookie. <u>Learn more</u>. In addition, Google Analytics supports an optional browser <u>add-on</u> that - once installed and enabled - disables measurement by Google Analytics for any site a user visits. Note that this add-on only disables Google Analytics measurement.

Google Analytics also collects Internet Protocol (IP) addresses to provide and protect the security of the service, and to give Wood Concepts a sense of which country, state, or city in the world their users come from (also known as "IP geolocation"). Google Analytics provides a method to mask IPs that are collected (detailed below) but note that website owners have access to their users' IP addresses even if the website owners do not use Google Analytics.

Wood Concepts does not send any other <u>Personally Identifiable Information</u> to Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

#### **DATA USAGE**

Identifiers such as cookies and app instance IDs are used to measure user interactions with a customer's sites and/or apps, while IP addresses are used to provide and protect the security of the service, and to give the customer a sense of where in the world their users come from.

We do not share Google Analytics data, except in circumstances when required by law.

Security-dedicated engineering teams at Google guard against external threats to data. Internal access to data (e.g., by employees) is by strict access controls (both internal policy controls and automated technical controls such as authentication, SSL, and security logs) to only those with a business need to access it.

# Data privacy and security

#### Certifications

#### **EU Privacy Shield**

The U.S. Department of Commerce has approved Google's certification to the Privacy Shield as fully compliant. View Google's Privacy Shield certification.

#### ISO 27001

Google has earned ISO 27001 certification for the systems, applications, people, technology, processes, and data centers serving a number of Google products, including Google Analytics. Download the certificate here (PDF) or learn more about ISO 27001.

#### Information security

In web-based computing, security of both data and applications is critical. Google dedicates significant resources towards securing applications and data handling to prevent unauthorized access to data.

Data is stored in an encoded format optimized for performance, rather than stored in a traditional file system or database manner. Data is dispersed across a number of physical and logical volumes for redundancy and expedient access, thereby obfuscating it from tampering.

Google applications run in a multi-tenant, distributed environment. Rather than segregating each customer's data onto a single machine or set of machines, data from all Google users (consumers, business, and even Google's own data) is distributed among a shared infrastructure composed of Google's many homogeneous machines and located in Google's data centers.

In addition, Google Analytics ensures secure transmission of its JavaScript libraries and measurement data. Google Analytics by default uses HTTP Strict Transport Security (HSTS),

which instructs browsers that support HTTP over SSL (HTTPS) to use that encryption protocol for all communication between end users, websites, and Google Analytics servers. Learn more

Sources: https://support.google.com/analytics/answer/6004245

### What are your choices regarding cookies

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser. Listed here are the commonly used web browsers, with link to their support pages containing information on how to delete or refuse cookies:

- Google Chrome
- Microsoft Edge
- Microsoft Internet Explorer
- Mozilla Firefox
- Safari

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

### Where you can find more information about cookies

You can learn more about cookies and the following third-party websites:

AllAboutCookies: http://www.allaboutcookies.org/

Network Advertising Initiative: <a href="http://www.networkadvertising.org/">http://www.networkadvertising.org/</a>

### **Use of Data**

Wood Concepts may use the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues

• To provide you with news, offers and general information about other services and events we offer that are similar to those that you have already enquired about or been involved with, unless you have opted not to receive such information

### **Retention of Data**

Wood Concepts will retain your Personal Data only for as long as it is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Wood Concepts will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

### **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your country or other governmental jurisdiction, where the data protection laws may differ than those from your jurisdiction.

Your consent to this Privacy Policy, followed by your submission of such information, represents your agreement to that transfer.

Wood Concepts will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of Personal Data will take place to an organisation or a country unless there are adequate controls in place, including the security of your data and other personal information.

### **Disclosure of Data**

### Disclosure for Law Enforcement

Under certain circumstances, Wood Concepts may be required to disclose Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Legal Requirements**

Wood Concepts may disclose Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Wood Concepts
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

# **Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we take the necessary precautions to protect your Personal Data using commercially acceptable means, we cannot guarantee its absolute security.

# **Your Rights**

Wood Concepts aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever possible, you can update your Personal Data by contacting us directly to make the required changes.

You have the right to be given a copy of information held by us about you. We may charge a fee for this which will not exceed €5.00 euros. We will provide the requested information to you within 30 calendar days of the receipt of a valid request in writing or by email.

You have the right to have any inaccuracies in the i Personal Data held by us about you corrected, if inaccurate, or erased, if we do not have a legitimate reason for retaining that information. We will accede to any such valid requests within 30 calendar days of the receipt of a valid request by email to: gdpr@tms.ie

We reserve the right to request you to provide additional information in order to enable us to identify your personal data and/or to verify your identity.

### **Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

# **Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information of Children under the age of 18. If you are a parent or guardian and you believe that your Child/Children may have provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we will take the appropriate steps to remove that information from our records.

# **Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. Any changes to this Privacy Policy will be notified within the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

#### **Your Consent**

By using our site, you consent to our websites privacy policy.

#### **Governing Law and Jurisdiction**

This legal notice and all issues regarding this website are governed exclusively by Irish law and are subject to the exclusive jurisdiction of the Irish courts.

### **Contact Us**

If you have any questions about this Privacy Policy or requests regarding your personally identifiable or the possible we may have personally identifiable relative to you, please contact us at:

Email: gdpr@tms.ie

Phone: 0053 (0) 1 840 83 88

Wood Concepts, 23 Town Centre Mall, Swords, Co. Dublin