

Data Privacy Policy

Sofa Workshop takes the privacy of its customers very seriously and the security of your personal information is extremely important to us.

This policy together with our Sofa Workshop [Cookie Policy](#) and our Website [Terms of Use](#) sets out what information we collect about you, and how it will be used and stored by us when you use our Sofa Workshop websites, contact us electronically, visit our stores or contact us by telephone.

By obtaining a quote, making a purchase of goods or services from Sofa Workshop, or providing your contact details to us in store, visiting www.sofaworkshop.com, registering an account, placing an order or by communicating with Sofa Workshop online by telephone you are accepting and consenting to the practices described in this policy.

When we say 'we', 'our', 'us' or 'Sofa Workshop' in this policy we are referring to Sofa Workshop.

For the purpose of the General Data Protection Regulation (EU 2016/679), the data controller is The Sofa Workshop Ltd. Registered Office: Sofa Workshop, 2nd Floor Mill Pool House, Mill Lane, Godalming, Surrey GU7 1EY. Registered number 06707205.

What Information does Sofa Workshop collect?

When you place an order with Sofa Workshop in store, via our Room to Talk telesales department or on our website, the information that we collect and store relating to you is primarily used to enable us to provide our products and services to you. This is to ensure that we can carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.

Your name, address and contact details may be shared with our furniture suppliers and delivery contractors to ensure that we can fulfil our contractual arrangement with you to deliver the products and services you purchase from us.

Sofa Workshop hold this information for the full period of the furniture guarantee to allow us to commit to the guarantee and send out our service managers if required.

If you choose to contact us using the live chat functions enabled on our websites, these are supported by selected third party providers who will store details of the chat securely on their own servers for 12 weeks.

If you request a fabric sample from us then we will share your name and address details with our furniture suppliers who will only use this for providing you with this sample. Once this has been provided, your details will be deleted.

If you request a service or a repair from us this will normally be completed by a preferred third party to repair your furniture, at which point we will share your name and address details with our service team who will use this only for providing you with the repair service.

If you provide information to us about any person other than yourself, you must ensure that they understand how their information will be used and that they have given their permission for you to

disclose it to us and for you to allow us to use it for the purposes discussed with you e.g. to arrange for delivery of the furniture.

If you use our website to register an account, participate in discussion boards, enter a competition, complete a survey, upload a photo to #sofaworkshop, request a call back from our Room to Talk team or report a problem with our products and services, the information you provide to us will be stored and may be used to facilitate that request or service.

Finance Applications: If you wish to enter into a finance agreement to purchase furniture, we will facilitate this for you by passing your information to the finance providers with whom we have agreed arrangements in place. Those finance providers are third party data controllers and are therefore responsible for any information that you provide to them. Sofa Workshop enable you to set up a direct relationship with these providers. The third party finance providers may, for example, ask credit reference agencies about you, keep records to help them decide whether to grant credit and to provide you with finance.

Once the finance company have accepted your application for finance, Sofa Workshop only keep records in relation to which finance provider you have entered into an arrangement with in order to finance your purchase with us as well as the loan terms and the value of the finance requested. The finance provider with whom Sofa Workshop works are Barclays Partner Finance. Details about their own privacy policies are available on request.

Guardsman: If you purchase Guardsman sofacare from Sofa Workshop, to enable us to arrange your policy, we will share details of your order, your name and contact details to our insurance administrator, Guardsman part of The Sherwin-Williams Company. They will hold this information and share it with any agents or associated company for the purposes of administering your policy, which may include carrying out customer surveys, claim handling and fraud prevention. Guardsman are third party data controllers and are therefore responsible for any information that you provide to them. Details about their own privacy policy is available at <https://privacy.sherwin-williams.com/privacy-highlights>.

VAT Refunds: We will never ask you to provide us with sensitive personal data unless we require it to complete your requests. This may be if you are exempt from VAT in relation to a disability, in which case we may require data relating to your physical or mental health in order to make arrangements requested by you. If you choose to provide this sensitive personal data to complete your request, we will only use it for the specific reasons discussed with you.

- **Information Sofa Workshop receives from other sources:** We may also collect information about you from other sources, and combine such information with information we hold about you, including where:
 - You use any of our other websites including those of our Group Companies or other services that we provide;
 - We communicate with members of your family or your household in relation to provision of our services or products (for example, to arrange for delivery);
 - Our trusted partners have collected information about you, and you have consented to disclosure to us. For example, you may have entered a competition with a third party and given your consent for your details to be shared with Sofa Workshop for the purposes of entering a prize draw or receiving a product discount;

- o Information is available about you publicly, or is aggregated or anonymised by a third party. For example, we may apply demographic analysis of your postcode such as average household size, and average income, and the general location;
- o You provide information to us through your use or interaction with our social media channels.

Why do we collect information and how do we use it?

Under the GDPR we must have a lawful reason for using (or 'processing') your personal information. One of the lawful reasons is 'legitimate interests'. Legitimate Interests means that we can process your personal information if we have a genuine and legitimate reason *and* we are not harming any of your rights and interests in doing so.

So, what does this mean? When you provide your personal details to us, we use your information for our legitimate business interests to ensure we can provide you with the best service possible and help us ensure you only receive relevant information from us.

Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

Some typical examples of when we might use the approach are for preventing fraud, direct marketing, maintaining the security of our system, data analytics, enhancing, modifying or improving our services, identifying usage trends and determining the effectiveness of our advertising.

We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate marketing, information, service and products and provide the best and most secure experience. These are what we consider our 'Legitimate Interests'.

Our interests

The following are when and why we would use this approach:

Direct Marketing: We will only send you emails and updates which relate to relevant promotions and offers that we feel will be of interest to you if you have actively consented to receiving it prior to 25th May 2018.

If you have obtained a quote from us you have the option to;

1. Hear from us specifically in relation to the quote you have received.
2. Receive updates about new products, inspiration and promotions that we think might be of interest to you.

This information will be shared with partners, suppliers, and agencies so they can process your personal information on our behalf. We only share information that allows them to provide their services to us or to facilitate them providing their services to you. For example, some of our service

providers place advertising for us online, about our products and services. As a result, where you have indicated you are happy to receive marketing from us, you might see online advertising that we have placed on the websites you visit, or the interactive services you use.

We will continue to process your information in this way until you advise otherwise. You can opt out of this processing activity at any point using the unsubscribe link on all emails, and by using the contact us function on our website.

We will never sell your details to other companies so that they can market to you.

Customer Service surveys: When you make a purchase from us, we will share your name and contact details with third parties who will contact you on our behalf to conduct Customer Service surveys by email and telephone. These surveys allow us to review the customer experience and allow us to provide improved customer service and are not marketing. The results of these surveys are then passed back to Sofa Workshop to review and take any relevant action. The personal information we share with them is deleted from their systems after 5 years. These surveys contain no promotional material or marketing messages however if you do not want to receive further surveys you can opt out on receipt of them. These third parties will store your email address if you choose to unsubscribe to ensure that they do not send you further surveys on our behalf.

Analytics: We process your personal information, collected as part of your furniture purchases for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.

Sofa Workshop may use selected third parties to do this. Where your personal information is disclosed to any of our service providers for these purposes, they will only have access to the information needed to perform the functions, and our contractual agreements with them do not permit them to use your personal information for their own purposes.

- **Call recording:** Any telephone calls you receive from, or make to Sofa Workshop may be recorded. This is for training and quality purposes to allow us to ensure a high level of customer services is achieved. We may also record your details of the telephone number you use to contact us. This telephone number will be deleted after 12 weeks.
- **Protecting you:** Processing your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.
- **Using our websites or apps:** During each of your visits to our website we may automatically collect the following information from you:
 - Technical information, including the Internet Protocol (IP) address used to connect your device to the Internet, your Sofa Workshop account login information, browser type and version, time zone setting, the country and telephone area code where your device is located, browser plug-in types and versions, operating system and platform
 - Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our websites (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from page, and any phone number you dial to contact our telesales or customer services departments.

This information will be used to administer our websites and telephone services, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. It allows us to improve our websites and telephone services to ensure that information is provided in the most effective manner for you (and for your device). It allows you to participate in the interactive features of our service if you choose to do so. It will also allow us to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

We may combine the information you give to us with information that we collect or buy from third parties about you. We use this information for the purposes set out above.

The personal information collected in this way is held on file for as long as necessary to provide the products and fulfil the transactions you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes and enforcing our agreements.

Your interests

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will 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).

How do we use Cookies?

Our website uses cookies to distinguish you from other users of our site. This helps us to provide you with a good online experience and allows us to make improvements. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy

How do we store your data?

Any personal data that is provided to us is stored on our secure servers and/or those of the service provider hosting our site on our behalf. Any download of information relating to any transactions entered into on our site that will be encrypted to help ensure its safety.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share passwords with anyone.

Sofa Workshop will only retain personal data for as long as is necessary to provide the products and fulfil the transactions you have requested, or for other essential purposes such as complying with our legal obligations. If you have any questions relating to our retention or destruction of your data, please contact us using the details set out in the Contact Us section.

In accordance with the General Data Protection Regulations (EU 2016/679), we employ strict physical, electronic and administrative security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage both on-line and off-line. The transmission of information via the internet is, however, not secure

and therefore we cannot guarantee the security of data sent to us electronically by you. Any transmission of such data is therefore entirely at your own risk. If you have any questions relating to security of your data, please contact us using the details set out in the Contact Us section.

Legal Obligations

You should be aware that if we are requested by the police or any other regulatory or government authority investigating suspected illegal activities to provide your personal information, we may be obliged to do so.

Where we sell part or all of our business to a third party, in which case we may disclose your personal data to the prospective or actual seller or buyer of such business or assets.

Where we are legally required to disclose your information or in order to enforce or apply our terms and conditions or other agreements; or to protect our rights, property, or safety or those of our customers or other third parties.

Third Party Links

You may find links to third party websites on our site. The operators of those websites will apply their own privacy policies and you should check them before you use them or submit any data to them. We are not responsible for their policies or the way they use your data or cookies, and we will not be liable for any loss, damage or distress you may suffer or incur as a consequence.

Access to information and other rights

The GDPR gives you the right to:

- Access information that we hold about you. If you wish to exercise your right of access, you must submit a written request and provide proof of your identity before we supply the information to you.
- Ask us to prevent processing that is causing - or is likely to cause - you substantial damage or distress;
- Require us not to make certain decisions automatically if they significantly affect you;
- Ask us to make any necessary changes to the personal data we hold about you in order to ensure that it is accurate and up to date;
- Ask us to have your personal data erased and to prevent processing in specific circumstances:
 - o Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
 - o When the individual withdraws consent.
 - o When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
 - o The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
 - o The personal data has to be erased in order to comply with a legal obligation.
 - o The personal data is processed in relation to the offer of information society services to a child.

We may refuse to comply with a request for erasure when personal data is processed for the following reasons;

- o to exercise the right of freedom of expression and information;
- o to comply with a legal obligation for the performance of a public interest task or exercise of official authority.
- o for public health purposes in the public interest;
- o archiving purposes in the public interest, scientific research historical research or statistical purposes; or
- o the exercise or defense of legal claims.

Should you wish to contact us about any of these matters, please use roomtotalk@sofaworkshop.com

Contact Us

If you have any questions or concerned with how Sofa Workshop process your personal information please do not hesitate to contact us via our website or contacting us by email at roomtotalk@sofaworkshop.com.

If you are unhappy with how we are processing your personal information you have the right to refer the complaint to the regulator, the Information Commissioners Office. You can do this by visiting their website or contacting them at 0303 123 1113.

This Privacy Policy was last updated in May 2018.