

1. Who we are

In this policy, references to:

- we, us, or our means Screwfix Direct Limited, a limited company registered in England (company number: 3006378), whose registered office is Trade House, Mead Avenue, Yeovil, Somerset, BA22 8RT, United Kingdom; or Screwfix Direct (Ireland) Limited, a limited company registered in Ireland (company number: 645397), whose registered office is 6th Floor, 2 Grand Canal Square Dublin 2, Ireland (together known as “**Screwfix**”);
- digital services mean our website and any software and web-based applications that we make available for your use (“**Digital Services**”);
- you or your (“**you/your**”) means you, the user; and
- competition means The Trade Apprentice or Top Tradesperson competitions (“**Competition**”).

You can find out how to contact us in Section 7 below.

2. Your Privacy

During your interactions with us, we will collect and process personal information about you. Personal information includes any information allowing us to identify you as an individual, including, but not limited to, your name, your email address, your telephone number, or your occupation.

For the purposes of the EU General Data Protection Regulations (“**EU GDPR**”), the UK General Data Protection Regulations (together known as “**GDPR**”), the Data Protection Act 2018 and equivalent data protection laws, we are the data controller in respect of your personal information that we collect and process, however, we may share your personal information with other organisations that may further process your personal information as a controller in their own right, you can find out more in Section 5 below. We are committed to protecting your privacy. We will use your personal information in accordance with all applicable laws and regulations that relate to data protection and privacy, including the GDPR.

This policy outlines:

- what personal information we collect, use and why;
- how long we will keep your personal information;
- who we share personal information with;
- your data protection rights; and
- how to contact us.

3. What personal information we collect, use, and why

We collect or use the following personal information about you, to be able to effectively manage your entry within the Competition.

When you enter the competition, we may collect your:

- name;
- business name (if applicable);
- postcode;
- full address;
- email address;

- telephone number;
- age;
- nationality;
- occupation;
- Screwfix Customer ID;
- information about your background, including criminal records data and education/skills information;
- user generated content that you consent to us sharing on our Digital Services and/or on our social media channels, which may include any photos and information you have posted on your social media account about your Screwfix purchase or experience.

We have outlined below the purposes for which we use your personal information. We are also required by law to state a "legal basis for processing", meaning we need to inform you on what grounds we are allowed to use your information. The legal basis for each purpose is that we either have your consent, need to comply with a legal obligation, or find it necessary for our legitimate interests, which will be explained below. 'Legitimate interests' refer to the processing of personal information that is necessary for the operation of our business but does not override your rights and freedoms.

Please note, we will always process your personal information to comply with our legal obligations, such as in connection with a court order.

PURPOSE OF PROCESSING	OUR LEGAL BASIS
to register for the competition;	Consent - where we use your information to register for the Competition, we will ask for your consent before processing your personal information.
to reach out to you regarding the submission of a review or feedback on a service after its completion;	Consent - where we contact you to leave a review about the service, we will ask for your consent before processing your personal information.
to publish user-generated content and Screwfix-generated content on our websites and social media channels;	Consent - where we use your user generated content (such as your social media posts) we will ask for your consent before processing your personal information.
to conduct a comprehensive background check using all publicly available sources and to perform security checks to prevent and detect crime;	Legitimate Interests - we use your personal information to safeguard against unlawful activities. In some cases, we may be legally required to disclose your personal information, such as to law enforcement agencies.
to handle complaints or claims against us;	<p>Legitimate Interests - we use your personal information to address claims made against us. In some situations, we may also be legally required to disclose your personal information, such as in relation to legal proceedings.</p> <p>Legal Proceedings - if the personal information includes special categories of data (such as health information), we will process this information</p>

	because it is necessary for the establishment, exercise, or defence of legal claims.
to comply with any legal requirement, including adherence to a court order;	Compliance with Legal Obligations - we process your personal information to comply with specific legal requirements, such as court orders or regulatory mandates.
to obtain a reference from your customers;	Consent – where you may be contacted to ask for a customer reference, we would ask for your consent before the reference is requested.
to contact you about future competitions and media opportunities that may interest you;	Consent - where we use your information to contact you, we will ask for your consent before processing your personal information.
to provide you with essential service communications during the competition, including those related to your entry;	Legitimate interests - we use Your personal information to contact You with essential service communications.

Our Competitions are not intended for minors (individuals aged under 16 years old), and we do not knowingly process personal information in relation to minors.

4. How long we keep personal information

We are required by law to keep your personal information only for as long as is necessary for the purposes for which we are using it. The period for which we keep your personal information will be determined by reference to different criteria, including the purposes for which we are using the personal information, the amount and sensitivity of the personal information, the potential risk from any unauthorised use or disclosure of the personal information, and our legal and regulatory obligations.

5. Who do we share your personal information with

We are a member of the Kingfisher Group of companies, being companies, whose ultimate parent is Kingfisher plc and whose other members include Screwfix, B&Q, Castorama and Brico Dépôt (for more information on the Kingfisher Group please visit www.kingfisher.com).

We may share your personal information with other members of the Kingfisher Group in connection with the purposes above and those listed below. Members of the Kingfisher Group may also use the personal information we share with them to improve their websites and other services and for analysis purposes.

We may use automated decision-making when we make decisions by technological means without significant human involvement, and non-automated processes, to help generate business insights based on the customer experience and evaluate or predict customer purchasing preferences. This may include sharing personal information with Kingfisher plc (our parent company), who may then, having received this personal information, use its own similar processes and then share the results with us for the same purposes and to help improve overall customer experience. This means Kingfisher plc may receive and process your personal information in its own right and subject to its own privacy notices which are available on its respective websites.

We may also disclose your personal information to third parties, including in the following circumstances:

- external agencies and organisations (including the police and other law enforcement agencies) for the purpose of preventing and detecting criminal activity. These external agencies may check the personal

information we give them against public and private databases and may keep a record of such checks to use in future security checks;

- our external marketing agencies, to advertise the Competition for the future;
- our third-party claim handlers in connection with any claim made or likely to be made against us; and
- If we sell or buy any business or assets, we may share your personal information with the prospective seller or buyer. If a third party acquires us or most of our assets (or in case of reorganisation within our group), your personal information will be among the transferred assets.

Where will your personal information be processed

Your personal information may be transferred, stored, and processed in one or more countries outside our country of establishment. These countries may not offer the same level of protection for personal information. In such cases, reasonable steps and appropriate measures will be taken to ensure that your personal information is protected in accordance with the law.

These measures include either:

- Transferring your personal information to countries that have been deemed to provide an adequate level of protection for personal information under applicable data protection law; or
- Transferring your personal information where the recipient has agreed to an approved agreement in the form of the standard contractual clauses.

Occasionally, we may transfer your personal information in circumstances where there are no adequate safeguards where this is permitted by data protection law.

6. Your data protection rights

Under data protection law, you have rights including:

- **your right of access;** you have the right to ask us for copies of your personal information;
- **your right to rectification;** you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete personal information you think is incomplete;
- **your right to erasure;** you have the right to ask us to erase your personal information in certain circumstances;
- **your right to restriction of processing;** you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **your right to object to processing;** you have the right to object to the processing of your personal information in certain circumstances.
- **your right to data portability;** you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances; and
- **your right to withdraw consent;** when we use consent as our lawful basis you have the right to withdraw your consent.
- **your right to complain to the controller;** If you're unhappy with how your personal data has been handled whether in response to a request (e.g. access, erasure, objection etc) or more generally, you have the right to raise a complaint with us. We will review your concern in line with your rights under the Data Use and Access Act and acknowledge receipt within 30 days.

Our security procedures mean that we may request proof of identity before we are able to comply with these requests.

You do not usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you. You can find out how to contact us in Section 7 below, to make a data protection rights request.

7. How to contact us

If you have any concerns about our use of your personal information, you wish to exercise your data protection rights, speak to our Data Protection Officer or contact us regarding any other matter, you can:

- email us at: apprentice@screwfix.com or stt@screwfix.com

If you remain unhappy with how we have used your personal information after raising a complaint with us, you can also complain to the [Information Commissioner's Office](#) for the UK or the [Data Protection Commission](#).

8. Protecting your personal information

The transmission of personal information via the internet is not completely secure; this risk is common across the internet and not specific to our services. We cannot guarantee the security of your personal information transmitted to our services; any transmission is at your own risk.

9. Updates to this notice

We may update this notice from time to time. The latest version of this notice will be posted on our website.