

# PRIVACY POLICY

Last updated on 7<sup>th</sup> of January 2021

## What is this Privacy Policy for?

Steelcase (South-East) Ltd T/A Insightful Environments, a limited company with a capital of £2 000 000, whose registered office is located at 77-79 Farringdon Road, London, EC1M3JU (the "Company", "we" or "us"), has created this privacy policy for <https://www.store.ie-uk.com/> (the "Website") in order to demonstrate its firm commitment to privacy. ("We" or "Us", as used in this Privacy Policy, may include the Steelcase Inc family of companies).

This policy discloses the Company's information gathering and dissemination practices for the information collected through this Website. We encourage you to read this Policy before using this Website. Your use of this Website signifies that you agree with all terms of this Policy. This policy may be subject to change from time to time, as indicated below under the section "Changes to our Privacy Policy". Your continued use of the Website following the implementation of any changes will constitute your acceptance of those changes

The Company will be what's known as the 'Controller' of the personal data you provide to us.

## How we collect your data

We may collect several types of information from and about users of the Website. In relation with the use of the Website and any services associated with this use, your personal data may be collected by us in a number of ways, including:

- when you provide information to us by filling in forms on this Website. For example, this includes information provided at the time of setting up an account, logging in, administering your account, placing and managing orders on the Website, responding to your requests, processing returns, registering for newsletters and updates on this Website, subscribing to our services, participating in webinars, posting material or requesting further services;
- when you complete surveys that we use for research purposes;

- when you contact us for these and any other reason, we may monitor and keep a record of that correspondence;

## Children's privacy

Our Website is not intended to deliberately collect personal data from children. If you are under the age of 16, please do not use or provide information on the Website or on or through any of its features. If we discover that we have collected or are seen to collect personal data from a child under the age of 16 without parental consent, we will delete such information.

## What types of data do we collect?

The categories of your personal data that we may collect include, but are not limited to, the following:

- Identifying information that allows us to identify you personally and that you voluntarily provide, which includes: contact details, including names, postal addresses, email addresses and telephone numbers, or any other information that can be used to identify, locate or contact you online or offline;
- Information related to your orders and payments;
- Details of your visits to this Website including, but not limited to, traffic data, location data, weblogs and other communication data for the purpose of improving your access to and use of the Website.

## Why do we need your data?

We collect such information: (a) directly from you when you provide it to us; and/or (b) automatically when you visit the Website, including Website usage information, IP addresses and information collected through [Cookies](#)

We will not collect any personal data from you we do not need in order to provide and oversee our services to you. We process personal information about you for the following purposes:

- to provide you with, and to improve, our services;
- to deal with your enquiries and requests;
- to contact you in the course of providing services;
- to provide you with information about our services, and to advise you of news and industry updates, research, insights, events and promotions, reports and other information, and to carry out market research;
- to provide you with any other information that you request from us;
- to make business contact data available to the Company team about an account, client or opportunity they have an interest in; to comply with our legal and professional responsibilities; and
- where we have other legitimate reasons, such as for compliance.

## What do we do with your data?

Personal data collected by the Company is securely stored and is not accessible to third parties or employees except for use as indicated above.

## How long do we hold your data for?

Personal data will be retained on the Company's CRM for as long as it is necessary for the purposes set out above (e.g. for as long as we have, or need to keep a record of, a relationship with a business contact).

## Recipients of your data

We only communicate your personal data to authorized and determined recipients to meet the purposes previously indicated. These include in particular:

- (a) persons in charge of sales, finance, customer relations, logistics and IT services.
- (b) our subsidiaries and affiliates; and
- (c) our service providers and other third parties that we use to provide our services and who are contractually bound to maintain the confidentiality of personal data and to use it only for the purposes for which we disclose it to them.

We may also disclose your personal data:

- (a) to comply with any legal obligation, request or legal process, including to respond to any governmental or regulatory request; and
- (b) to enforce our [Terms and Conditions of Use](#) and our [Terms and Conditions of Sale](#).

## Data transfers outside the United Kingdom

Because the Company is a wholly-owned subsidiary of the Steelcase Group, with its ultimate parent company located in the United States, and given the international nature of our business and the centralized nature of certain Steelcase Group activities, your personal data may be stored and processed at various levels (e.g., global, regional and/or local) where the Steelcase Group has facilities, including outside the United Kingdom and/or outside the European Economic Area.

Also information submitted by users to the Website will be transmitted to and shared with third parties that may be located in other countries, in order to provide services to such users, including but not limited to transaction processing and fraud prevention.

To ensure adequate protection of personal data transfers outside the United Kingdom and/or the European Economic Area, the Company and its affiliates, subsidiaries and some service providers have implemented Standard Contract Clauses for the Transfer of Personal Data to Third Countries ("Standard Contracts"), in accordance with European Commission Decision 2004/915/EC of December 27, 2004. The Company is currently putting in place Standard Contracts with the remaining service providers for this Website, which will be finalised as soon as possible. You may obtain a copy of these Standard Contracts by contacting us at the following e-mail address: [privacy@steelcase.com](mailto:privacy@steelcase.com).

## Marketing

You can manage your marketing preferences at the time of setting up your account or placing your first order. You can change your preferences for receiving group marketing emails, updates and other information from us by clicking on the 'update your preferences' link in one of our emails.

If you receive marketing emails from us, you may unsubscribe at any time by clicking on the Unsubscribe button at the bottom of each email or by emailing [david.revis@ie-uk.com](mailto:david.revis@ie-uk.com).

You have the right to ask us not to process your personal data for marketing purposes. When we collect contact information from you (for example, when you provide us with your business card), we may add your details to our contacts database and to our mailing lists. In all other cases, we will usually inform you (before collecting your information) if we intend to use your information for marketing purposes, or we will seek your consent for such purposes.

## Your Rights

You have the right:

- to request access to your personal data, their correction, their deletion as well as the limitation of their treatment;
- when the processing is based on the execution of the contract, to request the portability of your data;
- to send specific instructions regarding the use of your personal data after your death;
- to object at any time to the processing of your personal data (i) for reasons relating to your particular situation, when such processing is based on the pursuit of our legitimate interests; or (ii) for the purposes of canvassing, including profiling to the extent that it is related to such canvassing.

We respect your privacy rights and will provide you with reasonable access to the personal data that you may have provided through your use of our services. If you wish to access or amend any of the personal data we hold about you, or to request that we delete or transfer any information about you that we have obtained, you may contact us at [david.revis@ie-uk.com](mailto:david.revis@ie-uk.com). At your request, we will have any reference to you deleted or

blocked in our database. We may refuse to grant the request if it is manifestly unfounded or excessive.

At any time, you may object to the processing of your personal data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please write to us at Insightful Environments, 29 Cloth Fair, London, EC1A 7JQ, marked to the attention of the 'Data Protection Officer'. You also have a right to lodge a complaint with the Information Commissioner's Office

## Cookies

We use cookies (small files which remember a user's electronic device) to help improve this Website, and improve our services to you, in a variety of different ways. For a more detailed description, please review our [Cookies Policy](#).

## The internet

Given that the internet is a global environment, using the internet to collect and process personal information necessarily involves the transmission of information on an international basis. Therefore, by browsing this Website and communicating electronically with us, you acknowledge and agree to our processing of personal information in this way. The transmission of information via the internet is not completely secure. Although we do our best to protect personal information, we cannot guarantee the security of your information transmitted to this Website; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

This Website may, from time to time, contain links to other Websites which are outside of our control and are not covered by this Privacy Policy. We do not accept any responsibility or liability for other Websites' privacy policies. If you access other Websites using the links provided, please check their policies before submitting any personal information.

This Website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such

social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

## Changes to our Privacy Policy

Any changes we make to our Privacy Policy in the future will be posted on our Website. Please do check our Privacy Policy from time to time to take notice of any changes made. If we substantially change the way we treat our users' personal data, we will notify you by e-mail via the e-mail address in your account, and/or by a notice published on the home page of the Website.

The date of last revision of the privacy policy is indicated at the top of the page.

## Contact

If you have any requests or queries concerning your personal information or any queries with regard to our practices, please contact us at [david.revis@ie-uk.com](mailto:david.revis@ie-uk.com).