



## Privacy Policy New

Protection of your personal data is important to us. In this Privacy Statement we explain how we collect and use your personal data.

### 1. Why do we process your personal data?

If you submit your personal data to us, we may process it for the purposes described below.

#### 1.1 To respond to your queries or communicate with you

We process your personal data when you contact us via our online contact forms.

We process your name, title, (business) contact details (including your email address, telephone number, name of your company) and any other information that you provide to us in the open field entry of the contact form.

We process this information based on your consent, which can be withdrawn by you at any time.

#### 1.2 For surveys or other (marketing) communication

We process your personal data to send you surveys on our products or services or to send you marketing communication, to keep you updated on events, special offers, products and services of Dulux Paints Ireland Ltd. We may create profiles and analyze your interactions with us. This way we learn about your interests and can customize our communication to meet your personal interests.

We process your name, address, date of birth (but only if you have provided us with that information voluntarily), your email address and other topics you may have actively and voluntarily shared with us.

We process this information based on your consent, which can be withdrawn by you at any time.

#### 1.3 For the development and improvement of products and services

We process aggregated personal data for various Dulux Paints Ireland Ltd business-related purposes, such as developing new products and services, enhancing, improving or modifying our websites, apps and other digital channels, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

When possible, we use aggregated data. Sometimes we process personal data such as your name, your email address, your IP address, gender, place of residence, digits of your zip code and any other information mentioned in this Statement or otherwise provided to us by you.

We process this information for our legitimate business purposes.

#### 1.4 For the technical and functional management of the app or Website

When you use our services, we may collect certain information automatically from your device. We process your personal data to help you find information in a quick and easy way and to improve access to and functionality of this website, app or other digital channel.

The information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g., country or city-level location), and other technical information. We may also collect information about how your device has interacted with our service, including webpages accessed and links clicked.

Collecting this information enables us to better understand the users of our services, where they come from, and what content is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our services, for product and service improvement, and the development of new features and functionality.

We process this information for our legitimate business purposes, i.e. to better understand how our customers interact with our websites.

### **1.5 When you create an account with us, to administer the account**

Upon your request, we can create a personal account for you to make the purchasing process easier for you.

We may process your name, a valid email address and any other information requested. We also process your display name, your role and your login data.

We process this information based on your consent, which can be withdrawn at any time.

### **1.6 When you purchase products through our web shop, to process your order and manage the relationship**

We use personal data to process your purchase and to deliver your order, to report the status of your order and to contact you about the transaction.

For this purpose, we process your name and address, contact details such as telephone number or e-mail address, credit card or other payment information, which will be processed by a PCI certified supplier, your acceptance of our applicable terms and conditions, and whether you want to receive our newsletter. We will also process information about what you have purchased from us and information through your registered interactions with Dulux Paints Ireland Ltd websites and apps (for which we may use cookies), your shopping history, both online (if you link your purchases to your profile) and offline (when making an offline purchase).

We process your personal data to carry out our purchase agreement with you and to deliver your order to you.

### **1.7 If you participate in prize contests, events, competitions, promotions and/or games of chance, to administer your participation**

With your consent, we can send you emails with promotions and invitations to participate in prize contests, events, competitions or games of chance. If you choose to participate in one of these activities, we need your personal data to be able to organize this.

If you participate in any of these activities, we need your personal data to announce when you are a winner, to distribute the prizes and to measure the response to prize contests, events, competitions, promotions and or games of chance.

We process this information based on your consent, which can be withdrawn at any time.

### **1.8 Compliance with laws and legal obligations and protection of Dulux Paints Ireland Ltd. assets and interests**

We will process your personal data as appropriate or necessary (a) under applicable law, including laws outside your country of residence and including e.g. counterparty due diligence, money laundering, financing of terrorism and other crimes; (b) to comply with legal obligations; (c) to respond to requests from public and government authorities including public and government authorities in our outside your country of residence; (d) to enforce our terms and conditions and other applicable policies; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

If so required, we may process your name, your contact information, your correspondence with Dulux Paints Ireland Ltd, your use of any of our products and/or services and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

We may process this information for our legitimate business purposes.

### **1.9 If you use the Visualizer App, to enable you to share your content**

We may process your personal data if you use our services to save and share images, videos or other user generated content to enable you to share the data. In this instance we may process metadata within these images, videos or other user generated content (which may include GPS location data and device identifiers depending on your device's privacy settings) and such personal data as is included within the content of the images, videos or other user generated content. This may even include sensitive personal data (such as may be determined from a person's appearance on a photo or video, if voluntarily uploaded by you through the App). We may also process data that you provide to us via your social media accounts. We process this information based on your consent, which can be withdrawn at any time.

Should you wish to share any personal data concerning other persons than yourself through the Visualizer App (e.g. through a photo or video), you should ensure that those other persons also consent to their data being uploaded to the Visualizer App for the purpose of being shared. If you share a link through the Visualizer App, this link will also be visible to others.

We may process the content you share through the Visualizer App to improve our products, websites and apps. If we do so, we process this information based on our legitimate interest – i.e. to improve our products and to improve customer engagement.

In general, we will use the personal data we collect from you only for the purposes described in this Privacy Statement or for purposes that we explain to you at the time we collect your personal data. However, we may also use your personal data for other purposes that are not incompatible with the purposes we have disclosed to you if this is permitted by applicable data protection laws.

If you provide us with information about someone else, please ensure you have the person's permission to do so for the purposes detailed in this Privacy Statement. By providing personal data relating to another person, you confirm that you have their consent to do so or are entitled to consent to the processing on their behalf (for example for children where you have parental responsibility).

## **2. Cookies and similar tracking technology**

We use cookies and similar tracking technology to collect and use personal information about you, including, subject to your consent, to serve you with interest-based advertising. For further information about the types of cookies we use, why, and how you can control cookies, please see our Cookie Statement.

## **3. With whom do we share your personal data?**

We may disclose your personal data to:

- our group companies, and third-party services providers who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our services), or who otherwise process personal data for purposes that are described in this Privacy Statement or notified to you when we collect your personal data. To ensure that your personal data is treated with a high level of protection, Dulux Paints Ireland Ltd has implemented the Dulux Paints Ireland Ltd. Binding Corporate Rules, which ensure that every Dulux Paints Ireland Ltd. legal entity applies the same level of protection to personal data. We have also agreed technical, organizational and contractual measures (data processing agreements) with third party suppliers to ensure that your personal data is exclusively processed for the purposes mentioned above and to ensure that the data is well secured;
- any competent law enforcement body, regulatory, government agency, court, or other third party where we believe disclosure is necessary: (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person;
- an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Statement; and
- other persons if you have consented to, or instructed us our suppliers to make, the disclosure.

#### **4. Where do we store your personal data?**

Your personal data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Our servers are in the European Economic Area, although our group companies and third-party suppliers operate around the world. This means that when we collect your personal data we may process it in any of these countries, subject to the following paragraph.

Countries outside the European Economic Area do not always have strong data protection laws. However, we will always take steps to ensure that your information is used by third parties in accordance with this policy and that we comply with applicable legal requirements to ensure adequate protection for your information. We will ensure that if your data are transferred to another country, it will continue to receive adequate protection, through Dulux Paints Ireland Ltd. own Privacy Rules for Customer, Supplier and Business Partner Data or through contractual arrangements with third parties. This may include implementing the European Commission's Standard Contractual Clauses for transfers of personal information, which require the recipient of data to protect personal information they process in accordance with European Union data protection law.

We may also transfer or disclose your personal data to our third-party suppliers, professional advisers, and to such other persons as we consider necessary for the administration of the services and our business.

#### **5. How do we secure your personal data?**

We use appropriate technical and organizational measures to protect the personal information about you that we collect and process. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data.

We have implemented a security policy that guards against unauthorized access. Data on our secure pages is encrypted using SSL technology. Your browser may indicate (and you should check) that the page is secure. It may be able to configure your browser to give a warning message when you first access any secure page on the site.

All your data will be encrypted at all times whilst in transit over the Internet. SSL is special software that automatically encrypts any data sent by you on our secure pages. Our server then reads the data using a private key. This means that your data, be it debit or credit card information or any other personal details, is turned into code that can only be decoded with the private key or password. All parts of the services that require you to enter personal data are secure.

Where we have given you (or where you have chosen) credentials which enable you to access certain parts of our services (such as usernames and passwords), you are responsible for keeping these confidential.

The transmission of information via the internet is not completely secure. Although we will do what we reasonably can to protect your personal data, we cannot guarantee the security of any personal data that you disclose online. You accept the inherent security implications of using the internet and we will not be responsible for any breach of security unless we have been in breach of applicable laws, and then only to the limits set out in any relevant terms and conditions.

## **6. How long do we retain personal data?**

We retain personal data we collect from you where we have an ongoing legitimate need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

## **7. What requests can you make in relation to your personal data?**

You have the following rights in relation to your personal data:

- You have the right to access, correct, update, or request deletion of your personal data. In addition, you can object to processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data. You can exercise these rights by contacting us using the contact details provided below.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the unsubscribe or opt-out link in the emails we send you. To opt-out of other forms of marketing, then please contact us using the contact details provided below.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- Whilst we would prefer you to come to us first with any complaints, you have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## **8. Links to other websites and social media**

Our services may contain links to and from the services of our partner networks, advertisers, affiliates and members of our corporate group. If you follow a link to any of these, please note that they should have their own privacy policies/terms of use, and we do not accept any responsibility or liability for them. Please check

their privacy notices before you submit any personal data to them.

We also offer the opportunity to create an account with us through your social network account (such as Facebook). This will save you time in creating the account, as your sign-on credentials will be imported from your social network account. Please note that when you use this "social sign-on" option, we may receive certain information via the social network, such as your name, age, location, preferences, occupation, and other information from your public profile. This information is not requested by us but is provided by the social network using the social sign-on option. When you use the social sign-on option, we will only import the information that is necessary for the creation of your account with us and will, upon receipt of any other information, delete the other information received through the social network. After having created your account, you will have the opportunity to supplement it with any information you want to share with us.

### **9. May persons below the age of 16 provide personal data?**

Persons below the age of 16 may only provide personal data to us if they have written permission of one of their parents or their legal guardian who has read this Privacy Statement.

### **10. How to contact us**

If you have any questions or concerns about our use of your personal data, please contact us using the [contact us](#) [1] form or the following details:

Mail: Ireland Privacy Officer

Dulux Paints Ireland  
Unit J, South Dublin Business Park  
D24 YK25

The data controller of your personal data is Dulux Ireland Paints Ltd.

### **Links**

[1] <https://www.dulux.ie/en/contact-us>