

Stroma Privacy Policy

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1.0 Introduction

Stroma is committed to safeguarding the privacy of our website visitors, applicants and other service users. This Privacy Policy explains how we will handle the personal data that is submitted to us through our varied services, and applies to the following divisions of the Stroma Group:

- Stroma Certification.
- Stroma Software
- Stroma Technology.
- Stroma Building Control.

By using the Stroma website, www.stroma.com (including all online portals) and agreeing to this Privacy Policy, you consent to our use of cookies in accordance with the terms of this policy. Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications. You can also limit the publication of your information; however, this is may be subject to specific terms and conditions based on the agreement held with Stroma.

2.0 How we Use your Personal Data

Stroma have detailed in this section the following key elements to how we will use personal data:

- The categories of personal data that we may process through our levels of interaction.
- The source and categories of personal data that we did not obtain directly from you.
- The purposes of how we may process personal data.
- The legal requirement of processing personal data.

2.1 Usage Data

Stroma may process data about your use of our website and services, referred to as 'usage data'.

The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely the monitoring and improving of our website and services.

2.2 Account Data

Stroma may process your 'account data' which may include your name and email address.

The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.3 Profile Data

Stroma may process your information included in your personal profile on our website which is referred to as 'profile data'.

The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.4 Service Data

Stroma may process your personal data that is provided during the use of our services, and is referred to as 'service data'.

The service data may include submissions through online and/ or paper based forms and notifications. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.5 Enquiry Data

Stroma may process information contained in any enquiry that you submit to us regarding products and/ or services, and this is referred to as 'enquiry data'.

The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/ or services to you.

2.6 Transaction Data

Stroma may process information relating to transactions, including purchases of goods and services, that you enter into with us and/ or through our website, and is referred to as 'transaction data'.

The transaction data may include your contact details, your credit/ debit card details and the transaction details. The transaction data may be processed for supplying the purchased goods and services, and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/ or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

2.7 Notification Data

Stroma may process information that you provide to us for subscribing to our email notifications and/ or newsletters, and is referred to as 'notification data'.

The notification data may be processed for the purposes of sending you the relevant notifications and/ or newsletters. The legal basis for this processing is the performance of a contract between you and us and/ or taking steps, at your request, to enter into such a contract.

2.8 Correspondence Data

Stroma may process information contained in or relating to any communication that you send to us, and is referred to as 'correspondence data'.

The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

2.9 Personal Data

Stroma may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

2.10 Cookies

2.10.1 What is a Cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many companies do this whenever a user visits their website in order to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on the Stroma website. However, you can **change your cookie settings** at any time.

During the course of any visit to a Stroma website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

2.10.2 How does Stroma use cookies?

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better user experience. Stroma uses this type of information to help improve the services we provide to our users. Certain areas of Stroma websites may use cookies for a specific reason - for example, to help you search for a Stroma-certified member.

Additionally, Stroma uses cookies to serve some targeted advertising on Stroma.com. You can find out more and opt out of receiving these cookies by visiting our [website](#).

2.10.3 Third party cookies in embedded content

Please note that during your visits to Stroma websites you may notice some cookies that are not related to Stroma. To support our content, we sometimes embed content from social media and other third party websites. These may include YouTube, Twitter, Facebook and Instagram. As a result, when you visit a page containing such content, you may be presented with cookies from these websites and these third party cookies may track your use of the Stroma website. Stroma does not control the dissemination of these cookies and you should check the relevant third party's website for more information.

Where Stroma embeds content from social media and other third party websites, some websites may use [Google Analytics](#) to collect data about user behaviour for their own purposes. This is a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate use of those services and compile a report for us. This is not something which Stroma controls.

2.10.4 Stroma cookies and how to reject cookies

Full information about how Stroma uses cookies, and how to control what cookies are set on your device through the Stroma website, can be found on our [website](#). It is important to note that if you change your settings and block certain cookies, you will not be able to take full advantage of some features of Stroma services, and we might not be able to provide some features you have previously chosen to receive.

2.10.5 Performance cookies

These help us understand how people are using the Stroma website so we can improve it. Some examples of how we use these cookies are:

- To collect information about which web pages visitors go to most often so we can improve the online experience
- Error management to make sure that the website is working properly
- Testing designs to help improve the look and feel of the website.

2.10.6 Do Not Track (DNT) browser setting

DNT is a feature offered by some browsers which, when enabled, sends a signal to websites to request that your browsing is not tracked, such as by third party ad networks, social networks and analytic companies. This website does not currently respond to DNT requests.

2.10.7 Other information collected by Stroma

Stroma may also collect other information about your device, such as an IP address and details about the browser that you are using. If you have any concerns about the way that we use cookies or respect your settings, then please contact us at compliance@stroma.com.

3.0 Amendments

Stroma may make amendments to this Privacy Policy to improve our privacy control measures, and the latest copy of the Privacy Policy will be displayed on the Stroma website.

4.0 Contact Details

If you have any questions concerning this Privacy Policy you can contact us using one of the following methods:

- Email - info@stroma.com
- Telephone - 0845 621 1111
- Writing - 4 Pioneer Way, Castleford, West Yorkshire, WF10 5QU

This policy statement has been endorsed and approved by:



Mr Steve Horrocks
Managing Director
Stroma

Dated: 23rd March 2018