

Grigoriou Interiors Privacy Notice

INTRODUCTION

This is Grigoriou Interiors Limited Privacy Notice.

Grigoriou Interiors Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit any of our websites (regardless of where you visit them from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Grigoriou Interiors Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletters and reports or browse through our website. It also details what data we might collect and how we treat it for different services you might sign up for with us.

This website is not intended for children and we do not knowingly collect data relating to children.

CONTROLLER

Grigoriou Interiors Limited is the controller and responsible for your personal data (collectively referred to as "GI", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights in respect of your personal data, please contact us using the details set out below.

CONTACT DETAILS

Our full details are:

Grigoriou Interiors Limited

The Exchange, New Wing, Somerset House, Strand, London, WC2R 1LA

E: design@grigoriou.co.uk

Tel +44 (0) 207 580 0611

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes home and business address, delivery email address and telephone numbers.
- **Financial Data** includes your credit card details and/or bank account details
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- We may collect **Special Categories of Personal Data** about you during our WFH (Working from Home) Space Consultation, specifically information about your health. You do not have to share such data with us to use this service. We will not collect details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and genetic and biometric data). We do not collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel any services you obtain from us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us in person or by post, phone, email or otherwise. This includes personal data you provide when you:
 - Subscribe to our newsletter
 - Meet us and give us your business card
 - Request marketing or information to be sent to you including proposals
 - Subscribe to our training platform 'Grigoriou Education'
 - Download our Free Design Guide 'Realizing the Value of Wellbeing in Interiors' or any future publications.
 - Sign up to our WFH Space Consultation - you will be asked to fill in a questionnaire online prior to the consultation. The consultations are then remote and are being held via Zoom. The sessions are recorded to enable the team to review and provide you with recommendations. The recordings will be stored for maximum 30 days on our server and then deleted permanently.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the UK;
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
 - Identity and Contact Data from publicly available sources such as websites following a google or other search engine companies, based inside and outside the UK.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, if you give us your business card, we may include these details in our CRM system.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending you our newsletter. If you wish to receive our newsletter we will ask you to confirm that in writing. If you have done so but change your mind at any time you have the right to withdraw consent to marketing at any time by contacting us on design@grigoriou.co.uk or by using the Unsubscribe option within the Newsletter. If you wish to cancel your subscription to the Grigoriou Education Training Platform, or be removed from our course community, please contact us on education@grigoriou.co.uk (cancellations are subject to our Terms of Use).

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|------------------|--------------|--|
|------------------|--------------|--|

| | | |
|---|--|---|
| To deal with you as a potential client of the Company | (a) Identity (b) Contact | (a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to define types of customers for our products and services and to grow our business) |
| To deal with you as a subscriber to our Training Platform 'Grigoriou Education' | (a) Identity (b) Contact (c) Financial (d) Technical (e) Usage (f) Marketing and Communications | (a) Necessary to comply with our contractual obligation to you |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated) |
| To provide you with the information you may require to help you decide if you wish to become a client | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Necessary for our legitimate interests to provide information of the services we offer and projects we have worked on |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about products that may be of interest to you | (a) Identity (b) Contact (c) Technical | Necessary for our legitimate interests (to develop our business strategy, advise on our products/services and grow our business) |

| | | |
|---|---|---|
| | (d) Usage (e) Profile (f) Marketing and Communications | |
| To conduct our WfH space assessment | (a) Identity (b) Contact (c) Technical (d) Financial (e) Marketing and Communications | (a) Necessary to comply with our contractual obligation to you |
| To add students to our course community | (a) Identity (first name, surname) (b) Contact (email address) | Necessary for our legitimate interests (to develop our business strategy, highlight our products/services and grow our business), as well as the legitimate interests of our students (to offer additional knowledge and support from industry experts within our team) |

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing.

We have established the following personal data control mechanisms:

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you or where you tell us which products you are interested in hearing about. This is how we decide which products, services and offers may be relevant for you.

THIRD-PARTY MARKETING

We do not share any personal data with third parties. Should it be necessary we will get your express consent before we share your personal data with any company outside Grigoriou Interiors Limited (including any sister company or subsidiary of GI) for marketing purposes. We currently use Mailchimp as our email agent.

OPTING OUT

You can ask us at any time to stop contacting you with our marketing messages. Please email us

on design@grigoriou.co.uk or by using the 'Unsubscribe' option you will find in every Newsletter.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a contract between us. We will keep that data on our CRM system so we can continue working with you.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us design@grigoriou.co.uk.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the United Kingdom and/or the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the UK and/or EEA.

There are provisions which permit the transfer of personal data from UK to the EEA and to any countries which, as at 31 December 2020, were covered by a European Commission 'adequacy decision'. This is to be kept under review by the UK Government.

Current regulations can be found [HERE](#).

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties

who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us on design@grigoriou.co.uk.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/products and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us on design@grigoriou.co.uk.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

EXTERNAL THIRD PARTIES

- Service providers acting as controllers or joint processors based in the EEA and US who provide CRM services, IT and system administration services, data storage and processing services, introduction and advisory services;
- Professional advisers acting as processors or joint controllers including lawyers, insurers and accountants
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal

data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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