

## STATEMENT

We are Stewart Signs Ltd, a subsidiary of Stewart Signs Holdings Ltd, operating from our Registered Office address at Trafalgar Close, Chandler's Ford Ind. Est., Eastleigh, Hampshire SO53 4BW. We supply and install self-adhesive graphics and signage primarily for the Road Fleet, Rail & Marine Industries throughout the UK.

In Stewart Signs we are committed to protect and respect your privacy in compliance with the 7 core principles of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This Privacy Statement applies to our sales, marketing, customer contract fulfilment activities and personnel.

## WHEN DO WE COLLECT PERSONAL DATA ABOUT YOU?

- When you are buying our products.
- When you interact with us in person, through correspondence, by phone, by social media, or through our websites.
- When we collect personal information from other legitimate sources, such as third-party data aggregators, Stewart Signs marketing partners, public sources or social networks. We only use this data if you have given your consent to them to share your personal data with others.
- We may collect personal data if it is considered to be of legitimate interest, and if this interest is not overridden by your privacy interests. Before data is collected, we make sure an assessment is made to ensure there is a mutual interest between us.
- When you visit our site CCTV systems may record your image and store this for a limited time.

## WHY DO WE COLLECT AND USE PERSONAL DATA?

We collect and use personal data mainly to perform direct sales, direct marketing and customer service. We also collect data about suppliers, partners and persons seeking a job or working in our company.

We may use your information for the following purposes:

- Send you marketing communications which you have requested. These may include information about our products and services, events, and promotions of our products and services. This communication is subscription based and requires your consent.
- Send you information about the products and services that you have purchased from us.
- Perform direct sales activities in cases where legitimate mutual interest is established.
- Reply to a 'Contact me' or other web forms you have completed on [stewartsigns.co.uk](https://stewartsigns.co.uk).
- Follow up on incoming requests (customer support, emails, chats, or phone calls).
- Provide you with access and services related to Stewart Signs Client or supplier area.
- Perform contractual obligations such as order confirmation, invoice, reminders, and similar. The contract may be with Stewart Signs directly or with a Stewart Signs partner.

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- Notify you about any disruptions to our services (system messages).
- Contact you to conduct surveys about your opinion on our products and services.
- Process a job application.
- Employment information required by employment and, health and safety law.

### OUR LEGAL BASIS FOR COLLECTING PERSONAL DATA

#### COLLECTING PERSONAL DATA BASED ON CONSENTS

The collection of personal data based on consent from the data subject will be done by using “Consent Forms” that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems.

#### COLLECTING PERSONAL DATA BASED ON CONTRACTS

We use personal information for fulfilling our obligations related to contracts and agreements with customers, partners and suppliers. In formation may, on occasion, be included in software controlled by AI. Where AI is used, document and software control will be in accordance with the Stewart Signs AI Policy.

#### COLLECTING PERSONAL DATA BASED ON LEGITIMATE INTEREST

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest. Normally, to establish the legal basis for data collection, an assessment has been made during which a mutual interest between Stewart Signs and the individual person has been identified. This legal basis is primarily related to our sales and marketing purposes. We will always inform individuals about their privacy rights and the purpose for collecting personal data. Information on a data subject will not be used if a request is refused by said data subject.

#### WHAT TYPE OF PERSONAL DATA IS COLLECTED?

We collect name, phone number, title and email address, in addition to your company’s name and contact information. We may also collect comments and questions received from you in service-related communication and activities, such as meetings, phone calls, documents, and emails. Our websites may collect IP-address and actions taken on the site. If you upload photos or videos, add posts or comments, etc. on our website, the information can be read by anyone with access to the site and used for purposes over which Stewart Signs or you have no control. Therefore, Stewart Signs is not responsible for any information you submit to the website.

To comply with PCI policy when processing Customer card payments, Stewart Signs do not collect any data or record phone calls. The customer will either receive a link for them to complete a transaction, or the details are entered directly to a third-party system with no

access from Stewart Signs. It is not possible to review card details after the payment has been processed.

If you apply for a job at Stewart Signs, we collect the data you provide.

Employees and contractors may be required to provide copies of documents to prove your age, right to work (in UK and/or secure sites) or identity where the law requires this. A driver's licence will include details of your full name, address, date of birth and facial image. A passport will also include your place of birth, gender and nationality.

Stewart Signs does not collect or process any special categories of personal data, such as public unique identifiers or sensitive personal data other than for employment purposes. Certain employees will drive a company vehicle which track the driver's performance for environmental and Health and Safety reasons.

### HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We store personal data for as long as we find it necessary to fulfil the purpose for which the personal data was collected, while also considering our need to answer your queries or resolve possible problems, to comply with legal requirements under applicable laws, to attend to any legal claims/complaints, and for safeguarding purposes.

This means that we may retain your personal data for a reasonable period of time after your last interaction with us. When the personal data that we have collected is no longer required, we will delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymized.

### YOUR RIGHTS TO YOUR PERSONAL DATA

You have the following rights with respect to your personal data:

- The right to request a copy of your personal data that Stewart Signs holds about you.
- The right to request that Stewart Signs corrects your personal data if inaccurate or out of date.
  - If you are a customer or partner and you have registered a profile on our website, you may update your user profile online.
- The right to request that your personal data is deleted when it is no longer necessary for Stewart Signs to retain such data.
- The right to withdraw any consent to personal data processing at any time. For example, your consent to receive e-marketing communications:
  - If you want to withdraw your consent to e-marketing, please make use of the link to manage your subscriptions included in our communication. Please note that you may still receive system messages and administrative communications from Stewart Signs, such as order confirmations, system messages and notifications about your account activities.
- The right to request that Stewart Signs provides you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract.

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- The right to request a restriction on further data processing, in case there is a dispute in relation to the accuracy or processing of your personal data.
- The right to object to the processing of personal data, in case data processing has been based on legitimate interest and/or direct marketing.

Any query about your Privacy Rights should be sent to [privacy@stewartsigns.co.uk](mailto:privacy@stewartsigns.co.uk)

### THE USE OF COOKIES AND BEACONS

We use cookies and web beacons ('Website Navigational Information') to collect information as you navigate the company's websites. Website Navigational Information includes standard information from your web browser, such as browser type and browser language; your Internet Protocol ("IP") address; and the actions you take on the company's websites, such as the web pages viewed and the links clicked.

This information is used to make websites work more efficiently, as well as to provide business and marketing information to the owners of the site, and to gather such personal data as browser type and operating system, referring page, path through site, domain of ISP, etc. for the purposes of understanding how visitors use a website. Cookies and similar technologies help us tailor our website to your personal needs, as well as to detect and prevent security threats and abuse. If used alone, cookies and web beacons do not personally identify you.

We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. Google Analytics is an AI based software used to detect changes in our website trends and traffic. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

### DO WE SHARE YOUR DATA WITH ANYONE?

We do not share, sell, rent, or trade your information with any third parties without your consent, except from what is described below:

### **THIRD-PARTY SERVICE PROVIDERS WORKING ON OUR BEHALF:**

We may pass your information on to our distributors, agents, sub-contractors and other associated organizations with the purpose of them providing services to you on our behalf.

### **THIRD-PARTY PRODUCT PROVIDERS WE WORK IN ASSOCIATION WITH:**

We work closely with various third-party product providers to bring you a range of products and services designed to meet your extended needs related to the supply or installation of our products. When you enquire about or purchase one or more of these products, the relevant party will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with us or them directly. In some cases, our third-party product providers will be acting as data processors of your information and, therefore, we advise you to read their Privacy Policy and sign a Data Processing Agreement. These third-party product providers will share your information with us, which we will use in accordance with this Privacy Statement.

### **IF REQUIRED BY LAW:**

We will disclose your personal information if required by law or if we, as a company, reasonably believe that disclosure is necessary to protect our company's rights and/or to comply with a judicial proceeding, court order or legal process. However, we will do what we can to ensure that your privacy rights continue to be protected.

### **USE OF SUB-CONTRACTORS (PROCESSORS AND SUB-PROCESSORS)**

We may use sub-contractors to process personal data on our behalf, we are responsible for making sure they commit themselves to adhere to this Privacy Policy and applicable data protection legislation by signing a Data Processing Agreement.

### **CHANGES TO THIS PRIVACY STATEMENT**

Our Data Protection Policy is achieved with controls, including policies, processes, procedures and software (including AI) and hardware functions. These controls are monitored, reviewed by the Board and improved to ensure that specific data protection and security compliance obligations are met. This is operated in conjunction with other business management processes, and incorporates the applicable statutory, regulatory and contractual requirements.

Stewart Signs reserves the right to amend this Privacy Statement at any time. The applicable version will be found on our website. We encourage you to check this Privacy Statement occasionally to ensure that you are happy with any changes.

If we make changes that significantly alter our privacy practices, we will notify you by email or post a notice on our websites prior to the change taking effect.

**YOUR RIGHT TO COMPLAIN WITH A SUPERVISORY AUTHORITY**

If you are unhappy with the way in which your personal data has been processed, you may, in the first instance, contact [privacy@stewartsigns.co.uk](mailto:privacy@stewartsigns.co.uk)

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner’s Office (ICO) [ico.org.uk](http://ico.org.uk)

Signed



Gareth Livingstone

CEO

This Privacy Statement was published 30 April 2018.

Last review 26 March 2026