

Relay Global Data Protection and Privacy Policy

1. Purpose & Scope

Decor Ireland Ltd (t/a Relay Global) ("Relay Global") is committed to protecting the privacy and rights of all individuals whose personal data we process, including customers, suppliers, employees, contractors, and other stakeholders.

This policy sets out how we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and applies to all personal data processed in any format.

2. Principles of Data Protection

Relay Global applies the following principles to all personal data:

- **Lawfulness, Fairness & Transparency** - Processed legally, fairly, and openly.
- **Purpose Limitation** - Collected for specified, explicit, and legitimate purposes only.
- **Data Minimisation** - Adequate, relevant, and limited to what is necessary.
- **Accuracy** - Kept accurate and up to date.
- **Storage Limitation** - Retained no longer than necessary.
- **Integrity & Confidentiality** - Protected by appropriate technical and organisational security measures designed to prevent unauthorised access, loss, alteration, or disclosure of personal data.

3. Data We Collect & Legal Basis

3.1 Categories of Data

- Identity & contact information (name, role, address, phone, email).
- Customer account and transaction data (orders, invoices, payments).
- Communications data (emails, phone calls, correspondence).
- Employment data (HR records, payroll, training, and where relevant, health or diversity data).
- Technical data (IP addresses, login data, website usage).

3.2 Lawful Bases for Processing

We process data on the following lawful bases:

- **Contractual necessity** - to deliver goods or services.
- **Legal obligation** - to comply with laws (e.g. tax, HR, safety).
- **Legitimate interests** - for business operations, balanced with individual rights.
- **Consent** - for specific purposes such as marketing communications.
- **Special category data** - processed only under Article 9 UK GDPR where necessary for employment, health & safety, or with explicit consent.



4. Use & Sharing of Data

Relay Global uses personal data for the following purposes, which are not exhaustive and may include other lawful business purposes consistent with this policy and applicable data protection legislation:

- Fulfil customer orders and manage accounts.
- Manage supplier relationships.
- Administer employee records and payroll.
- Provide customer service and handle returns.
- Comply with legal and regulatory requirements.
- Improve services and operations.

We may share personal data with:

- Suppliers and manufacturers.
- Couriers and logistics providers.
- Banks and payment processors.
- IT service providers.
- Regulators, auditors, or authorities.

Where third parties process personal data on our behalf, Relay Global ensures appropriate contractual safeguards are in place in line with UK GDPR requirements. We never sell personal data.

5. Individual Rights

Individuals have the right to:

- Be informed about how their data is used.
- Access their personal data.
- Rectify inaccurate or incomplete data.
- Erase data in certain circumstances.
- Restrict or object to processing.
- Data portability where applicable.

We do not carry out automated decision-making that produces legal or similarly significant effects on individuals. Requests should be directed to Relay Global's Data Protection Lead (details below).

6. Governance & Responsibilities

- **Managing Director** - Accountable for compliance and oversight.
- **Data Protection Lead (Managing Director or nominated delegate)** - Responsible for policy implementation, breach management, and responding to requests.
- **Managers** - Ensure staff follow data protection practices.
- **All Colleagues** - Must protect data and escalate concerns.
- **Suppliers & Partners** - Required to comply with UK GDPR where processing data on our behalf.



7. Data Breach Management

If a personal data breach occurs:

- The breach is reported immediately to the Data Protection Lead.
- Severity and risks to individuals are assessed.
- Where required, the ICO is notified within 72 hours.
- Individuals are informed if there is a high risk to their rights.
- The breach and corrective actions are recorded and reviewed.

8. Retention & Transfers

Personal data is kept only as long as necessary for the purpose collected, including legal and business obligations (e.g. tax, HR).

Examples:

- Payroll and tax records: 6 years.
- Customer invoices: 7 years.
- Supplier contracts: Duration of relationship plus 6 years.

Data transferred outside the UK is safeguarded by standard contractual clauses or adequacy decisions.

9. Children's Data

Our services are not directed at children, and we do not knowingly collect personal data from individuals under 16. If such data is identified, we will delete it promptly unless a lawful basis exists to retain it.

10. Contact Details

Data Protection Lead

Decor Ireland Ltd (t/a Relay Global)
10 Flush Park, Lisburn, BT28 2DX
Email: info@relay.global
Phone: +44 (0)28 9262 0300

Relay Global is registered with the UK Information Commissioner's Office (ICO) under registration number ZA873515.

11. Relationship with Other Policies & T&Cs

This policy replaces the previous standalone Privacy Policy.

A short Privacy Notice is available on our website to provide customers and individuals with a plain-language overview.



RelayGlobal

Relay Global is the trading name of **Decor Ireland Ltd**

www.relay.global

This policy works alongside the Supplier Code of Conduct, Returns Policy, and Terms & Conditions of Sale.

12. Governance & Review

This policy is issued by Decor Ireland Ltd (t/a Relay Global) and approved by the Managing Director. It will be reviewed annually, or sooner if required by changes in legislation or business practice.

