



the hot tub
and swim spa
company
everyday happiness

Vulnerable Customers Statement

We appreciate that sometimes our customers may be vulnerable as a result of a physical or mental health condition suffered by themselves or a family member, age, illiteracy, or if their first language is not English.

We are committed to ensuring that all of our customers are treated fairly and we meet all of their needs to the best of our ability.

This means that we may have to treat vulnerable customers according to their individual circumstances. In order to do so we have employed staff with experience of sales and customer service and given them the necessary training to enable them to identify the signs of vulnerability and how to proceed with that customer.

We ensure that our staff have the necessary training, knowledge, understanding and support in order to be able to identify the potential signs of a vulnerable customer in their dealings with them, and then tailor their approach accordingly.

Vulnerability is an extremely subjective area, however our staff are constantly on the lookout for potential signs, such as, a lack of understanding, communication issues and unusual or erratic behaviour.

The vast majority of our communication with customers is face to face and, in some instances, over the phone, which does however make it easier for our staff to be able to identify both short term causes of vulnerability, such as short-term illnesses or a bereavement, as well as long-term causes, such as mental illness or a disability.

If a member of staff believes that a customer could potentially be vulnerable then they will ask non-intrusive questions in order to understand the customer's circumstances, allowing them to identify if the customer is in fact vulnerable and how our approach will need to be tailored for that customer.

Any information gathered will be processed in line with GDPR and the Data Protection Act 2018. Where necessary, explicit consent will be obtained from a customer to enable us to process the details of their vulnerability accordingly. Customers will also be fully informed of how we will process this information.

We will always:

- Ask for a customer's explicit consent in order to record, store or process the details of their vulnerability, where it is necessary and appropriate to do so
- Clearly explain to the customer why we need to record, store or process the details of their vulnerability
- Clearly explain to the customer who the details of their vulnerability will be shared with

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Typically, we would only look to process the details of a customer's vulnerability where we may need to tailor our approach during our communications with them, or when we are entering their home for the purposes of a sales consultation or installation. We would therefore only share the details of the vulnerability with the relevant staff and representatives.

We ensure that all of our customers do not make a purchase with us or enter in to a credit agreement with one of our lender partners without fully understanding what they are entering in to.

If we believe that the customer is not fully aware of what they are entering in to then we will:

- Not continue with the sale of any products or services.
- Not continue with any application for credit to fund a purchase.
- Ask if a friend or family member is available to assist the customer, or we will arrange a follow-up appointment when a friend or family member is available.
- Provide the customer with all relevant information in a clear, fair and not misleading manner, allowing them to make an informed decision.
- Not refuse to deal with an individual due to their vulnerability. Instead we will work with them to ensure they are treated fairly.
- Not label different demographics or individuals as vulnerable without understanding their situation. We accept that no two people are the same and each individual should be handled on a case by case basis.

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