

## **HERRON ENGINEERING LTD - WEBSITE PRIVACY NOTICE**

Herron Engineering Ltd. (collectively referred to as "Company", "we", "us" or "our" in this privacy notice) respects your privacy and is determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website [www.herronengineering.co.uk](http://www.herronengineering.co.uk) (regardless of where you visit it from). We will also tell you about your privacy rights and how the data protection law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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### **1. WHO WE ARE AND IMPORTANT INFORMATION**

#### **What is the purpose of this privacy notice?**

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service or take part in a competition.

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

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **Data controller(s)**

Herron Engineering Ltd. is the data controller and responsible for your personal data.

- Company name: Herron Engineering Ltd.;
- Company registration number: NI55943;
- Registered office: 15 Herron's Road, Ballyward, Castlewellan, Co. Down, BT31 9SR;

- Telephone: 028 4065 0204, E-mail: info@herronengineering.co.uk

For all data related matters contact the Company Director.

### **Third-party links outside of our control**

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.

## **2. THE PERSONAL DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioners Office.

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

- **Identity Data** includes title, first name, last name and username.
- **Contact Data** includes billing address, delivery address, e-mail address and contact telephone number.

We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect your 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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **3. HOW WE COLLECT YOUR PERSONAL DATA**

We use different methods to collect data from and about you by contact forms, website visitor tracking, IP address, cookies or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:

- Apply for our products or services;

- Create an account on our website;
- Subscribe to our service or publications;
- Request marketing information to be sent to you.

We use a tool called **Google Analytics**. This collects information in an anonymous form, including the number of visitors to the website, where visitors have come to the site from and the pages they visited. We use this information to better understand how visitors find us and how they interact with our website. We use this information to make improvements and adjustments to our website, to deliver a better user experience.

We may collect information about your computer, including where available your **IP address**, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

We may obtain information about your general internet usage by using **a cookie file** which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve the Website and to deliver a better and more personalised service. Some of the cookies we use are essential for the website to operate. They enable us:

- to estimate our audience size and usage pattern;
- to store information about your preferences, and so allow us to customise our website according to your individual interests;
- to speed up your searches;
- to recognise you when you return to our website;
- cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

If you register with us or if you continue to use the website, you agree to our use of cookies. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit the website.

#### **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:

- **Performance of Contract** this 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.
- **Legitimate Interest** this means the interest of our business in conducting and managing our company to enable us to give you the best service/product and the 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 the Company Director.

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

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting the Company Director (see contact details below).

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

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 the Company Director 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 register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### **Promotional offers from us**

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Opting out**

You can ask us to stop sending you marketing messages at any time checking or unchecking relevant boxes to adjust your marketing preferences, by the opt-out links on any marketing message sent to you or by contacting us at [info@herronengineering.co.uk](mailto:info@herronengineering.co.uk) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration or other transactions.

### **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 the Company Director (details below).

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. WHO WE SHARE YOUR PERSONAL DATA WITH**

We have a responsibility to keep your information confidential and we take all reasonable care to prevent any unauthorised access to your personal data. We collect information about you to understand your needs and provide you with a better service.

We do not disclose information that you may give, such as name, address, telephone number or e-mail address to any external companies. However, we reserve the right to access and disclose individually identifiable information to comply with applicable laws and lawful government requests, to operate its systems properly or to protect itself or its users.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

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.

- IT and system administration providers;
- Professional advisers including solicitors, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services;
- HM Revenue & Customs, regulators and other authorities;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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. WHERE YOUR INFORMATION IS STORED**

The data that we collect from you is stored on a GDPR approved server within the United Kingdom and any payment transactions will be encrypted. However, depending on circumstances this may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff working for us or for one of our suppliers and operating outside the EEA. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## 7. DATA SECURITY

We are committed to ensuring that your information is secure. In order to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure any personal information.

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

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 unauthorised 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.

Details of retention periods for different aspects of your personal data are available in our retention policy, which you can request from us by contacting the Company Director (see contact details below).

In some circumstances you can ask us to delete your data (see **your legal rights** below for further information).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;

- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact the Company Director (see contact details below).

#### **No fee required – with some exceptions**

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 admin 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. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This privacy notice may be updated at any time without notice due to changes in the current legislation and other circumstances. It is your responsibility to read it each and every time you use our website.

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

### **11. QUERIES, REQUESTS OR CONCERNS**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact **the Company Director**, Herron Engineering Ltd., 15 Herron's Road, Ballyward, Castlewellan, Co. Down, BT31 9SR, Telephone: 028 4065 0204, E-mail: [info@herronengineering.co.uk](mailto:info@herronengineering.co.uk).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office – Northern Ireland, 3rd Floor, 14 Cromac Place, Belfast, BT7 2JB, Telephone: 028 9027 8757 / 0303 123 1114, Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)