

## Privacy Policy

Hedley Hydraulics Ltd are committed to protecting your privacy and we comply with the General Data Protection Regulation (GDPR) which applies across the European Union. This privacy policy explains how we collect, store and use data about you.

### 1. Information we collect from you

- **Data you give us**  
Such as information you provide when ordering goods or services, this can be described as personal data which you can be identified by.

The personal data that we use is set out below;

| Data Collected  | Why its collected   | How it is stored  |
|---|---|---|
| Name, telephone number, e-mail address and postal address | Enables us to contact customers / suppliers for core business purposes. | On our business software system which is password protected.                    |
| Bank details (only for suppliers)                         | To be able to pay supplier invoices                                     | On our business software system which is password protected.                    |
| Credit account application details                        | To enable us to check the status for credit accounts for customers      | On our business software, password protected and restricted access to accounts. |
| Merchant copies of visa slips                             | To check payment has been processed correctly                           | Never stored – always destroyed once checked                                    |

- **Data we collect about you**

With regard to each of your visits to our website we will automatically collect the following information:

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, any login information, details entered into any form submission, browser type and version, time zone setting, browser versions, operating system and platform, device and device types.

Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number.

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Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

- Data we receive from other sources.

We collect most information from you directly as explained above however we may also collect information from publicly accessible sources e.g. Companies House or directly from a third party. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). They may provide the information collected when you visit our sites or otherwise as set out above.

## 2. How we use your information

We use information held about you in the following ways:

Information you give to us is used for;

- Carrying out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To make searches about you or your business/ organisation at credit reference agencies. The agencies may record details of searches whether or not we agree to enter into an agreement with you. We may use credit-scoring methods to assess whether or not to enter into an agreement. The information may also be used for identity verification, debtor tracing, to prevent money laundering and to help without credit-risk and fraud prevention activities.
- To notify you about changes to our service;
- To ensure that content from our site is presented in the most effective manner;
- For our marketing purposes we would like to contact you by post, email and telephone about goods and services that we provide that we think you may be interested in and where we have a legitimate interest to do so. We will only contact you by electronic means where we have your consent to do so.
- You can tell us to stop marketing you at any time;
- To provide you, with information by post, email, telephone about other goods or services that we feel may interest you. Where we permit selected third parties to use your data, we will only do this where we are satisfied that there is a legitimate interest to do so and we (or they) will only contact you by electronic means if you have consented to this.

## 3. Information we collect about you, is used to;

- Administer our site and for internal operations, including, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner;
- As part of our efforts to keep our site safe and secure;

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- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
  - Information we receive from other sources. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### 4. Reasons we can collect and use your personal information

The law on data protection sets out a number of different legal grounds upon which organisations can rely to allow the collection and processing of personal data. We rely on the following as set out below:

##### Consent

In some cases we will specifically ask for your consent to process your data e.g. by ticking a box or confirming verbally that you consent. In these cases we will always clearly explain what we will do with your data and will keep a record of your consent.

##### Contractual Obligations

In other cases, we will need to use your personal data to actually do what you are asking us to do and to perform our contract with you. E.g. to deliver a piece of equipment to you we will use your name and address and to provide a repair service we will pass details to our engineers.

##### Legal Compliance

If the law requires us to, we may need to collect and process your data to comply with our legal and regulatory obligations.

##### Legitimate Interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history to send you or make available personalised offers that we think will be of interest to you and your business. We will also use your address and phone number to contact you with direct marketing information by post and phone, telling you about products and services that we think may be of interest to you and your business.

5. Who we share your personal information with  
With selected third parties including:

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- Suppliers, delivery companies and sub-contractors for the legitimate completion of any contract we enter into with them or you;
  - Website hosts and analytics and search engine providers that assist us in the operation, improvement and optimisation of our site;
  - Credit reference agencies for the purpose of assessing you or your business'/ organisation's credit score where this is a condition of us entering into a contract with you or your business/ organisation and to provide on-going details if you or your business/ organisation fails to pay on time or default under an agreement.
  - We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.
  - In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets. The recipient of the information will be bound by confidentiality obligations.

## 6. Our Marketing

We may use your personal information to send you updates (by email, telephone or post) about our products or services, including exclusive offers, promotions or new products or services.

We have a legitimate interest in processing your personal information for promotional purposes. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations outside the group for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by: Contacting us at [hedley@hedley-hyd.com](mailto:hedley@hedley-hyd.com) or using the "unsubscribe" link in emails.

## 7. Where we store your personal data

Information will be held at our offices on password protected business software.

The data that we collect from you may be transferred to staff operating outside the EEA who work for one of our suppliers. These transfers are subject to special rules under the applicable data protection laws as some non-EEA countries (such as the United States of America) do not have the same level of data protection laws as the United Kingdom and EEA. We will ensure that any transfer to one of these countries complies with data protection law. Our standard practice is to use standard data protection "model" clauses that have been approved by the European Commission. If you would like further information please contact us.

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. How long we will keep your information for
- We will keep your personal information while you have a contract with us or we are providing products and services to you. Thereafter, we will keep your personal information for as long as is necessary:
  - To respond to any questions, complaints or claims made by you or on your behalf;
  - To show that we treated you fairly;
  - To keep you updated about new products and services that we think will be of interest to you and your business;
  - To keep records as required by law.
  - We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

9. Your Rights

You have the following rights, which you can exercise free of charge:

|   |  |
|---|--|
| Access  | The right to be provided with a copy of your personal information (the right of access)  |
| Rectification   | The right to require us to correct any mistakes in your personal information   |
| To be forgotten   | The right to require us to delete your personal information—in certain situations  |
| Restriction of processing                                 | The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data   |
| Data portability  | The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations  |
| To object   | The right to object:<br><br>at any time to your personal information being processed for direct marketing (including profiling);<br>in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests. |
| Not to be subject to automated individual decision-making | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you   |

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the General Data Protection Regulation.

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If you would like to exercise any of those rights, please contact us.

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [hedley@hedley-hyd.com](mailto:hedley@hedley-hyd.com).

#### 10. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Below are the third party tools we use:

##### Google Analytics

Page views, source and time spent on website are part of the user website activities information we can see with this cookie. This information cannot be tracked back to any individuals as it is displayed as depersonalised numbers; this is in order to help protect your privacy whilst using our website.

Using Google Analytics we can take account of which content is popular, helping us to provide you with reading and viewing materials which you will enjoy and find useful in the future.

We also use Google Analytics Remarketing cookies to display adverts on third party websites to our past site users, based on their past visits. The data we collect will only be used in accordance with our own privacy policy and Google's privacy policy.

Should you not wish for your website visits to be recorded by Google Analytics, you are able to opt-out with the addition of a browser add-on: [tools.google.com/dlpage/gaoptout/](https://tools.google.com/dlpage/gaoptout/)

#### 11. Contact Us

For any enquiries regarding our privacy policy or data protection, please do not hesitate to contact us on 01924 259999 or e-mail [hedley@hedley-hyd.com](mailto:hedley@hedley-hyd.com).