

# HURLSTONE ASSOCIATES LTD PRIVACY POLICY

Hurlstone Associates Limited is committed to protect the privacy of individuals who either visit our website, contact us directly by phone for technical advice and information, request quotations from our Principal companies including Arrow Valves, Senso-Heat, Purewater Storage, Keraflo, Cisterniser, Flowtech and Therma-skirt and those who participate and attend one of our services/events such as the CPD Seminars.

This Privacy Policy covers Hurlstone Associate's use of personal data collected from you.

## 1. Data Controller

The Data Controller who is responsible for your personal data is Hurlstone Associates Limited whose office is situated at 1 Amersham Hill, High Wycombe, Bucks, HP13 6NQ. Our contact details are: Tel: 01494 534638, email: [enquiries@hurlstoneassociates.co.uk](mailto:enquiries@hurlstoneassociates.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We appreciate the chance to deal with any concern you have prior to raising the issue with the ICO.

## 2. Personal Data collected from you and how it is processed

When using our website's online facilities, making an enquiry or when requesting a quotation, you will be required to provide personal data in relation to yourself and your company.

Personal data in this Privacy Policy means information that specifically identifies you in relation to your legitimate business interest.

### Information we collect about you

Personal data is collected from you when you request our services, make appointment bookings, apply for a job or enter into correspondence with us.

The information we collect about you is:

- Your Company Name, Address and contact details
- Your contact telephone numbers and mobile numbers if provided by you
- Your business email address
- Communication preferences – i.e. news letter product and service updates

### *Information we collect from other parties other than yourselves.*

We generally only collect information directly from you via a visit from you to our website, when you contact us directly by phone for technical advice and information, request quotations from our Principal companies including Arrow Valves, Senso-Heat, Purewater Storage, Keraflo, Cisterniser, Flowtech and Therma-skirt and those who participate and attend one of our services/events such as the CPD Seminars.

In addition, we may collect information from colleagues in your organization or from other organisations such as a consultant who may have pointed us in your direction with regards to a project being awarded to you, and our equipment being specified.

### ***Information we provide to third parties***

We generally do not provide any personal data about you to a third party. However, we will pass on information with consent to arrange additional or alternative quotations for equipment we represent on a project you may be bidding on or working on for specified equipment to be quoted.

### ***How we use any personal data collected from you.***

We use personal data collected from you principally for the purposes of providing our services. We generally do not share information with other parties.

We will only process your data in the following circumstances:

- Where it is necessary for our **legitimate interests** to allow us to organise and run courses and events for all attendees.
- To send you newsletters or other communications that you have consented to receive. You may unsubscribe from these at any time by clicking the link in the communication or by logging onto your customer account and amending your preferences
- Where we are under a legal or regulatory obligation

## **3. International Transfers**

We do not transfer your personal data outside of the European Economic Area

## **4. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

## **5. Data retention**

### **How long will you use my personal data for?**

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, which you can request from us by sending an email to: [enquiries@hurlstoneassociates.co.uk](mailto:enquiries@hurlstoneassociates.co.uk)

## 6. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please submit a written request to us at [enquiries@hurlstoneassociates.co.uk](mailto:enquiries@hurlstoneassociates.co.uk)

#### **No fee usually required**

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 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.

## **7. Cookies**

When you visit our website, we also collect information automatically about your visits, such as browsing patterns. However, information collected in this way is only used in aggregate and anonymous form rather than being linked to identifiable individuals.

When you visit our website, we may send you cookies. Cookies are small pieces of data that our site transfers to your computers' hard drive when you visit the website. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie and a value which usually is a randomly generated unique number. The following two types of cookies are used on our website:-

#### **Session Cookies**

These are temporary cookies that remain in the cookie file of your browser until you leave our website. These allow you to carry information across the pages of our website and avoid you having to re-enter information.

#### **Third Party Cookies**

Third parties provide persistent cookies via our website. These are used to compile anonymous, aggregated statistics in order to serve advertisements on our website and track whether these advertisements are clicked on by users in order to control how often you are shown a particular advertisement. They also count the number of anonymous users of the website and provide security within transactions.

Our cookies cannot be used by themselves to identify you. You have the ability to accept or decline cookies by modifying the setting in your browser. However, you may not be able to use all of the interactive features of our website if the cookies are disabled. You may disable cookies through your browser by following the instruction on [www.allaboutcookies.org/manage](http://www.allaboutcookies.org/manage)

## **8. Links to other Web Sites**

To give you a better service our site contain links to other organisations websites. When connecting to other websites we recommend that you read the privacy statements on entering other such websites as you will no longer be subject to this policy but to the privacy policy of the new site.

## **9. Changes to our Privacy Policy**

If there are any changes to this Privacy Policy, we will replace this page with an updated version. It is therefore in your own interest to check the "Privacy Policy" page any time you access our web site so as to be aware of any changes which may occur from time to time.

## **10. Feedback**

Any comments or suggestions on how we manage your privacy will be welcome and can be submitted by emailing [enquiries@hurlstoneassociates.co.uk](mailto:enquiries@hurlstoneassociates.co.uk)