



## INTRODUCTION

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of UK data protection laws, the data controller is INDUCTION COIL SOLUTIONS LIMITED of Unit 4-5 Naunton Park Industrial Estate, Churchill Road, Cheltenham, Gloucestershire, GL53 7EH (collectively referred to as “we”, “us” and “our” in this policy).

## DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner than ensures appropriate security.

## INFORMATION YOU GIVE TO US

We may collect, use, store and transfer different kinds of personal information about you, including:

- **Identity Data**, such as your name, title, username or similar identifier, marital status, company details, job title, date of birth, gender, a copy of your passport and driving licence,
- **Contact Data**, such as your billing address, delivery address, email address and telephone numbers,

- **Financial Data**, such as payment card details, VAT number, details of any county court judgments or bankruptcy proceedings you may be subject to,
- **Transaction Data**, including details about payments to and from you, and other details of products and services you purchase from us,
- **Technical Data**, including IP addresses, your log-in data, browser type and version, time-zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website, engineered drawings
- **Profile Data**, such as your username, password, purchases or orders made by you, your interests, feedback and survey responses
- **Usage Data**, including information about how you use our website, products and services and
- **Marketing Data**, such as your preferences in receiving marketing from us and our third parties, and your communication preferences.

#### 'SPECIAL CATEGORY' DATA

Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as 'special category' data.

During the course of dealing with you, we do not expect to collect any 'special category' data about you.

#### HOW WE COLLECT YOUR PERSONAL INFORMATION

We may obtain personal information by directly interacting with you, such as:

- placing orders for products on our website;
- making enquires through our online form on our website;
- creating an account on our website;
- subscribing to our services or publications or otherwise requesting marketing material to be sent to you,
- giving us your business card
- meeting with you at our premises, at events or elsewhere or
- corresponding with us by phone, email, letters or otherwise.



We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- analytics providers (such as Google);
- advertising networks;
- search information providers;
- providers of technical, payment and delivery services;
- Companies House, DueDil, LinkedIn and Twitter
- Other Companies;
- Your employer or other referee;
- Disclosure and Barring Service (DBS);
- credit checking companies

### HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent;
- we need to perform a contract we are about to enter into, or have entered into, with you;
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests; or
- where we need to comply with a legal or regulatory obligation.

We will only use 'special category' information:

- provided we have your explicit consent to use it;
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent;
- where it is necessary for reasons of substantial public interest;

- where you have previously made that data public knowledge; or
- if we need to use that data to establish, exercise or defence legal claims.

However, during the course of dealing with you, we do not expect to collect any ‘special category’ data about you.

**PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION**

We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the ‘legal basis’ that allows us to use your information, as follows:

<b>Purposes for which we will use the information you give to us</b>	<b>Legal basis</b>
To register you as a new customer	It will be necessary for the performance of the contract between you and us.
To process your instructions and, if accepted, to carry out our obligations under any contracts entered into between you and us and to provide you with the information and [services / goods] that you request from us (including managing payments, fees and charges)	It will be necessary for the performance of the contract between you and us.
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for products that you have ordered from us
To notify you about changes to our terms of sale or this privacy policy	It will be necessary for our legitimate business interests, namely to ensure you are aware of our current terms and conditions
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website. We will comply with our cookie policy when processing this information

services that may interest you or them	
To provide you with information about special offers and other products we sell that are similar to those that you have already received from us	Where you have previously received marketing communications from us, then it will be necessary for our legitimate business interests, namely to ensure you continue to receive communications that you have previously agreed to receive  In all other cases, we will only do this if you give us your consent
To provide follow up services to our clients, build further customer advocacy and earn reviews for our services and products using companies such as TrustPilot, ReeVoo.	It will be necessary for our legitimate business interests to ensure we are fully aware of all issues relating to your organisation that is the subject of the goods and/or services you have expressed an interest from us.

We will only use your personal information for the purpose(s) 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**WHAT IF YOU CANNOT OR WILL NOT PROVIDE US WITH YOUR PERSONAL INFORMATION**

It is a contractual requirement for you to provide us with certain information, namely your name, email address, phone number, debit/credit card information, delivery address and billing address. If you do not provide us with that information, we will be unable to accept and process your order and deliver the products to you.

**COOKIE POLICY**

We do not use any cookie in managing our website.

However, please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

**DISCLOSURE OF YOUR INFORMATION**

We may share your personal information with the parties set out below:

- our business partners, suppliers and sub-contractors to the extent we consider it reasonably necessary for us to perform our services;
- providers of IT and system administration services to our business, including Microsoft's Office 365, Microsoft Azure, Dropbox, One Drive, Google Drive, *Westway IT(IT Management)*, *Quay Websites Design (website provide & Administrator)*
- our professional advisers (including accountants, solicitors, bankers, auditors and insurers),
- your solicitor or personal representative
- HM Revenue & Customs, the Information Commissioner's Office, regulators and other authorities who require reporting of processing activities in certain circumstances,
- providers of email marketing, web-based project management applications and customer engagement platforms to our business, including Xero
- training providers or external events organisers;
- social media platforms such as Facebook, Twitter, Instagram, LinkedIn;
- analytics and search engine providers that assist us in the improvement and optimisation of our website, and
- 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 information in the same way as set out in this policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

### WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us is stored on our secure servers in the United Kingdom.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **PCI DSS standards.** We comply with the Payment Card Industry Data Security Standards in relation to debit/credit card payments made on our website.
- **Emails:** All our emails are hosted within Microsoft's Office 365 infrastructure;
- **Server:** our server backup is hosted within Microsoft Azure.

- **Building entry controls.** We have physical controls in place in our buildings which restricts access to your personal data to keep it safe such as padlocked gates, alarm systems and CCTV.
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind;
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Equipment.** Our internal policies require that individual monitors do not show confidential information to passers-by and that users lock or log-off from their computer when it is unattended.
- **Password Protection.** We employ password protection to protect sensitive data.
- **Training.** We ensure our employees are trained in the importance of data security.
- **Overseas transfers.** Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Union, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; 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.

**HOW LONG WE WILL STORE YOUR PERSONAL INFORMATION**

The length of time that we will store your data will depend on the ‘legal basis’ for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation	We will use/store your data for as long as it is necessary for us to comply with our legal

to which we are subject	obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

### YOUR RIGHTS

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.

- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact our nominated Officer Jodie Stratford by writing to the address at the top of this policy, or by emailing us at [jodie@inductioncoilsolutions.co.uk](mailto:jodie@inductioncoilsolutions.co.uk).

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

### AUTOMATED DECISION-MAKING

We do not use automated decision-making processes.

### THIRD PARTY LINKS

Our 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. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### CHANGES TO OUR POLICY

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email. Please check our website frequently to see any updates or changes to our policy.

### CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to Jodie Stratford by writing to the address at the top of this policy, or by emailing us at [jodie@inductioncoilsolutions.co.uk](mailto:jodie@inductioncoilsolutions.co.uk)

