

# Privacy Policy

Lockwood Group Ltd is committed to protecting and respecting your privacy. This is the privacy policy and notice (sometimes called fair processing policies and notices) for the Lockwood Group. This policy explains how we will collect use and transfer of your information under the terms of this policy and how you can consent or withdraw consent.

## 1 Who has access to your information

1.1 We have access to information about you if you use our site. For the purpose of the Data Protection Act 2018 (“DPA”) and the General Data Protection Regulation (“GDPR”) and related legislation (“Data Protection Legislation”), we are the data controller and our address is

Ripley Road, Sawmills, Ambergate, DE56 2JR.

You can contact us via

Telephone: 01773 857272

Webpage: [www.lockwoodgroup.co.uk](http://www.lockwoodgroup.co.uk)

## 2 Data Protection Principles

2.1 We will comply with data protection law. This says that the personal information we hold about you must be:

- (a) Used lawfully, fairly and in a transparent way.
- (b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- (c) Relevant to the purposes we have told you about and limited only to those purposes.
- (d) Accurate and kept up to date.
- (e) Kept only as long as necessary for the purposes we have told you about.
- (f) Kept securely.

2.2 We also use contractors to service the site and to fulfil orders from customers. Where these contractors require access to your information, we have in place agreements which ensures that they will comply with Data Protection Legislation. This is explained further in section 7 below.

## 3 The kind of information we hold about you and how it is collected

3.1 We may collect information about your computer, including your IP address, operating system and browser type. We use this for Website administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns, and does not identify you.

3.2 Information that you provide by filling in forms on the Website. This includes information provided at the time of registering with us, ordering products or requesting information or further services and may include name and address, email address and telephone number. We may also ask you for information if you report a problem with our site.

3.2.1 If you contact us, we may keep a record of that correspondence within our system to

support your request/enquiry. The details of how long data is stored within our systems are documented within our Data retention policy.

## **4 How we use your information**

4.1 We use information about you in the following ways:

4.1.1 To provide you with access to parts of our site;

4.1.2 To allow us to supply the products or services you have requested;

4.1.3 To use and analyse the information we collect so that we can administer, support, improve and develop our services;

4.1.4 To tell you about important changes or developments to our services;

4.1.5 To tell you about other products and services we offer that may be of interest to you.

We only do this if you have agreed to receive this type of information; and

4.2 We may additionally need to process data for other purposes. Most commonly, we may use your personal information in the following circumstances:

4.2.1 Where we need to comply with a legal obligation, such as providing information to HMRC.

4.2.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (for example to prevent fraud). Or it is needed for the purpose of obtaining professional advice or establishing, exercising or defending legal rights.

4.3 We may also use your personal information in the following situations, which are likely to be rare:

4.3.1 Where we need to protect your interests (or someone else's interests) for example in the very unlikely event there was safety recall in relation to a product that we have sold;

4.3.2 Where it is needed in the public interest or for official purposes.

4.4 Change of purpose

We will only use your personal information 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.

4.5 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.

## **5 Information and password security**

5.1 Where you have a password, you are responsible for keeping the password confidential. Do not share the password with anyone.

5.3 Sending information on the internet is not completely secure. Although we do our best to protect your information, we cannot guarantee the security of the information transmitted to our site, for example if you use an unsecure Wi-Fi connection. Any transmission is at your own risk. Unless we have been negligent we are not liable for any loss arising from a breach of security.

## **6 Data Sharing**

We may have to share your data with third parties, including third-party service providers and other entities in the Lockwood Group. We require third parties to respect the security of your data and to treat it in accordance with the law.

### 6.1 Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### 6.2 Which third-party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: Electronic marketing services, delivery of goods and services, installations, warranties and engineering.

### 6.3 How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### 6.4 When might you share my personal information with other entities?

We will share personal data with approved suppliers of Lockwood Group in order to facilitate the supply of goods and services.

### 6.5 What about other third parties?

We may share your personal information with other third parties, for example to comply with the law.

## 7 Where is my data stored?

7.1 Your data will be stored in the UK and we will not transfer the personal information we collect about you outside the EU.

## 8 Data Security

8.1 We have put in place measures to protect the security of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially to keep it secure.

8.2 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

8.3 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 9 Data Retention: How long will you use my information for?

We will only retain your personal information 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. Details of retention periods for different aspects of your

personal information are available in our retention policy which is available from the Data Protection office. 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.

## **10 Rights Of Access, Correction, Erasure, And Restriction**

Your rights in connection with personal information. Under certain circumstances, by law you have the right to:

10.1 Access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

10.2 Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

10.3 Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

10.4 Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

10.5 Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

10.6 Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer in writing.

## **11 Accessing your personal data**

11.1.1 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

11.1.2 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **12 Right to withdraw consent**

If we have asked you to consent to the processing of your data, you have the right to withdraw your consent for that specific processing at any time. Consent can be removed via an email to the Data protection team.

To withdraw your consent, please contact our Data protection officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **13 Data Protection Team**

We have appointed a Data Protection Team to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

You also 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.

## **14 Other websites**

Our website contains links to other sites. Although we will always try to ensure these websites are reputable, we are not responsible for the privacy practices or the content of such websites.

## **15 Changes to our privacy policy**

We occasionally change this privacy policy and you should therefore review the policy regularly to ensure you are aware of any changes made by us.