



H K Wentworth Group

# Privacy Policy

HKW.DAT.PRIV.04-V3

## BACKGROUND:

H K Wentworth Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our websites, hkw, Electrolube or AF International ("Our Sites") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested when viewing any part of the website or other documentation relating to H K Wentworth Ltd.

## 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>"Account"</b>	means an account required to access and/or use certain areas and features of Our Sites;
<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Sites when you visit certain parts of Our Sites and/or when you use certain features of Our Sites. Details of the Cookies used by Our Sites are set out in Part 14, below; and
<b>"Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

## 2. Information About Us

Our Sites are owned and operated by H K Wentworth Ltd, a company registered in England and Wales with company number 00368850, whose registered office is at Ashby Park, Coalfield Way, Ashby De La Zouch, Leicestershire, LE65 1JR

VAT number: GB 450346764.

Data Protection Officer: dpo@hkw.co.uk.

Telephone number: +44 (0)1530 419600.

## 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Sites. Our Sites may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves, however, please contact us first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of Our Sites, we may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies and our Cookie Policy. We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences.

Data collected	How we collect the data
Identity Information including First name, Surname and consent to store information.	Form
Contact information including email address telephone and consent to store information.	Form
Business information including company name and matched business IP address.	Form Lead Forensics
Payment information including payment card details, bank account numbers	Form
Profile information including login username, login password, title, first name, surname, email address, telephone, contact preferences and consent to store information.	Form
Data from third parties including number of users and sessions, session duration, operating systems, device models, geography, IP address, browser type, distance to local stockist from user's postcode and matched business IP address.	Google Analytics. Google Location API Lead Forensics

## 7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What we do	What data we use	Our lawful basis
Registering you on Our Sites.	Identity and contact details	Legitimate business interest – to enable you to use the site securely.
Providing and managing your Account.	Identity and contact details	Legitimate business interest – to enable you to use the site securely.
Providing and managing your access to Our Sites.	Identity and login details	Legitimate business interest – to enable you to use the site securely.
Personalising and tailoring your experience on Our Sites.	Identity and contact details	Legitimate business interest – to enable you to use the site securely.
Personalising and tailoring our products for you.	Identity and contact details	Legitimate business interest – to enable security, fraud prevention, payments and refunds.
Supplying our products to you.	Identity and contact details	Legitimate business interest – to enable delivery of purchased products
Managing payments for our products	Payment details	Legitimate business interest – to enable payment of purchases
Communicating with you.	Identity and contact details	Legitimate business interest – to enable security, fraud prevention and to provide you with relevant information.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message, or post with information, news, and offers on our products. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

### 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of data	How long we keep it
Identity Information including name.	6 years
Contact information including email address and contact number.	6 years
Payment information	3 months.
Profile information including username and purchase information	will be deleted one month after you close your online account
Identity Information including name.	6 years

## 9. How and Where Do You Store or Transfer My Personal Data?

We may store or transfer some or all of your personal data in countries that are not part of the EEA. These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#).

Where we transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so.

## 10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11. How Can I Control My Personal Data?

- 11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Sites, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and, at the point of providing your details and by managing your Account).
- 11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. Can I Withhold Information?

You may access Our Sites without providing any personal data at all. However, to use all features and functions available on Our Sites you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14 and our Cookie Policy.

## 13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 14. How Do You Use Cookies?

Our Sites may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Sites and to provide and improve our products services. In addition, Our Sites uses analytics services provided by Google, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use Our Sites. For more details, please refer to our Cookie Policy.

## 15. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of The Data Protection Officer):

Email address: [dpo@hkw.co.uk](mailto:dpo@hkw.co.uk).

Telephone number: +44 (0) 1530 419600.

Postal Address: Ashby Park, Coalfield Way, Ashby De La Zouch, Leicestershire, LE65 1JR.

## 16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Sites following the alterations. We recommend that you check this page regularly to keep up-to-date.

## 17. Implementation of Policy

This Policy shall be deemed effective as of 15/08/2019. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.