

Page 1 of 14

Data Privacy Policy – Website

Document Author	Sally Chapman	
Document Approval:	Jason Abbott	
Date of Issue:	09/05/2018	
File Reference:	ISSUE 1: Data Privacy Policy for Website	
Period/Date of Review:	Annually	

Issue	Changed By	Date	Comments

This document and all the information contained within it is proprietary to AmSafe Bridport Ltd and is communicated in confidence. This document must not be used for any purpose other than that for which it is supplied and its contents must not be reproduced other than within AmSafe Bridport Ltd, and must not be modified, adapted, published, translated or disclosed to any third party, in whole or in part, without the prior written permission of the party concerned via AmSafe Bridport Ltd.

AmSafe Bridport Ltd, The Court, Bridport, Dorset, DT6 3QU

Tel: +44 (0) 1308 456666 **Fax:** +44 (0) 1308 456605

www.amsafebridport.com

A division of AmSafe Bridport Ltd. Registered in England No 140449

Approved by:	President	Date
Jason Abbott	Aussi	21 May 2018
	\lor	



Page 2 of 14

CONTENTS

CLAUSE

- 1.0 IMPORTANT INFORMATION AND WHO WE ARE
- 2.0 THE DATA WE COLLECT ABOUT YOU
- 3.0 HOW IS YOUR PERSONAL DATA COLLECTED?
- 4.0 HOW WE USE YOUR PERSONAL DATA
- 5.0 DISCCLOSURE OF YOUR PERSONAL DATA
- 6.0 INTERNATIONAL TRANSFERS
- 7.0 DATA SECURITY
- 8.0 DATA RETENTION
- 9.0 YOUR LEGAL RIGHTS
- 10.0 GLOSSARY



AMSAFE BRIDPORT (UK) LIMITED Data Privacy Policy – Website Policy Number: ASB-DPP-003 Issue No. 01

Page 3 of 14



Page 4 of 14

Introduction

Welcome to the AmSafe Bridport Limited's Privacy Policy.

AmSafe Bridport Limited respects your privacy and is committed to protecting your personal data. This privacy policy informs you as to how we look after your personal data when you visit our website or otherwise interact with us in the course of business and tells you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1.0 Important information and who we are

Purpose of this privacy notice

This privacy policy aims to give you information on how AmSafe Bridport Limited collects and processes your personal data through your use of this website and otherwise when you interact with us during the course of business.

Controller

AmSafe Bridport Limited is the controller and responsible for your personal data (referred to as "Amsafe", "we", "us" or "our" in this privacy notice).

Contact details

AmSafe Bridport Limited

Info@amsafebp.com

The Court, West Street, Bridport, Dorset, DT6 3QU

01308 456666

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 (<u>www.ico.org.uk</u>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



Page 5 of 14

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 9 May 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.0 The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login 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 this website.
- Usage Data includes information about how you use our website, products and services.
- **Correspondence Data** includes any correspondence between us whether by email or otherwise (including all feedback and survey responses) and any notes of phone conversations or meetings, where personal opinions are expressed.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.



Page 6 of 14

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with your company (for example, to provide your company with our products). In this case, we may have to cancel a product you have with us but we will notify you if this is the case at the time.

3.0 How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Correspondence Data by filling in website forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - meet with us at exhibitions and networking events;
 - choose to take part in surveys and competitions at exhibitions and networking events;
 - request further product or service information or submit other enquiries to us about our business;
 - promote your products and services to us;
- Automated technologies or interactions. As you interact with our website, we may
 automatically collect Technical Data about your equipment, browsing actions and patterns.
 We collect this personal data by using cookies and other similar technologies. You can set
 your browser to refuse all or some browser cookies, or to alert you when websites set or
 access cookies. If you disable or refuse cookies, please note that some parts of this website
 may become inaccessible or not function properly. Please see our cookie policy
 (amsafebridport.com/cookie-policy) for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers such as Google Analytics based outside the EU;
 - Identity and Contact Data from industry groups, industry exhibitions and networking events which may be based outside or inside the EU.



Page 7 of 14

• Identity and Contact Data from publicly availably sources [such as Companies House and the Electoral Register based inside the EU.

4.0 How we use your personal data

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

- Where we need to perform the contract we are about to enter into or have entered into with your company.
- 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.
- Where we need to comply with a legal or regulatory obligation.

See the Glossary at the end of this policy to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please <u>contact us</u> here <u>amsafebridport.com/contact</u> if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register your company as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your company's contract and comply with our obligations in that contract.	(a) Identity (b) Contact	Performance of a contract with you
To manage and develop our business relationship with you including limited and targeted	(a) Identity (b) Contact	(a) Performance of a contract with you(b) Necessary to comply with a legal



Page 8 of 14

business to business marketing	(c) Correspondence	obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey at an event to which we both send attendees	(a) Identity (b) Contact	Express consent sought.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	 (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)



Page 9 of 14

Change of purpose

We will only use your personal data 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please <u>contact us</u> here <u>amsafebridport.com/contact</u>.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5.0 Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Other companies in the AmSafe Bridport Group acting as joint controllers or processors and who are based in Sri Lanka and the USA and provide IT and system administration services, sales administration services and undertake leadership reporting.
- Service providers acting as processors which may have servers based in the US who provide IT support, IT backup, data storage, email management and system administration services.
- Analytics and advertising service providers which may have servers based in the US for the purpose of analysing website user behaviour.
- 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 data in the same way as set out in this privacy notice.



Page 10 of 14

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

6.0 International transfers

We share your personal data within the AmSafe Bridport Group. This will involve transferring your data outside the European Economic Area (**EEA**).]

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data and we enter into intra-group contracts to ensure that this is the case.

Some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we have a specific contract with that processor in a form approved by the European Commission which ensures that service provider gives your personal data the same protection it has in Europe; or
- if the provider is based in the US, it is a member of the US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.



Page 11 of 14

Please <u>contact us</u> here <u>amsafebridport.com/contact</u> if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7.0 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.

8.0 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 in our retention policy which you can request from us by <u>contacting us</u> here <u>amsafebridport.com/contact.</u>

9.0 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

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.



Page 12 of 14

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **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.



Page 13 of 14

If you wish to exercise any of the rights set out above, please <u>contact us</u> here <u>amsafebridport.com/contact</u>.

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.

10.0 Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by *contacting us* here *amsafebridport.com/contact*

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.



Page 14 of 14

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.