

# Privacy Policy



As part of Hurst Group Northern Ltd, Hurst Plastics Ltd (trading as Hurst Doors) is committed to protecting and respecting your privacy.

This Policy explains when and why we gather personal information about individuals, how we use it, the conditions under which we may disclose it to others, the circumstances for keeping it and how it is stored.

This Privacy Policy has been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (2018) and applicable national Law. We may change this Policy from time to time, so please check this page occasionally to update yourself of any changes. By using our website(s), you are agreeing to be bound by this Policy.

Any questions regarding this policy and our privacy practices should be sent in writing to the Data Protection Officer, Hurst Group Northern Ltd, Aynsley House, Common Road, Low Moor, Bradford, West Yorkshire BD12 0UF.

## WHAT INFORMATION DO WE COLLECT?

We collect and process personal data about you when you interact with us and our products and when you purchase goods and services from us.

We obtain information about you:

- when you contact us directly, normally via our websites or social media, or our Sales and Customer Service teams by phone or email, or to make an enquiry or other request
- when you complete an account application form
- when you use our website(s) or register to receive communications
- from our network of installers or sales agents
- from our carefully selected business partners who provide products and services
- occasionally from other third parties who may lawfully pass to us information about you

The personal data we process might include your name, address, telephone number, email address, payment details and information related to the browser or device you use to access our website, plus any other information you may provide.

## HOW IS YOUR INFORMATION USED?

We will use your information for a variety of purposes, including:

- responding to a retail enquiry
- opening, managing and monitoring a trade account
- processing orders that you have submitted
- providing or managing any information, products or services which you have requested
- notifying you of changes to our products
- to help us identify you when you contact us
- for general administration purposes
- to help us improve the quality of our products and services
- to carry out analysis
- to send you communications which you have requested and that may be of interest to you. These may include information about our products and service

We may share your information for any of these purposes with:

- our authorised installer network; or sales agents
- our carefully selected business partners who provide products and services under our brand
- our service providers and agents who perform services on our behalf, such as data management firms

We do not share your data with any third parties, with the exception of:

- when we have been asked to provide a retail quote and pass the enquiry to an installer
- when we have been asked to provide information for legal or regulatory purposes
- when we are progressing existing or future legal proceedings
- when we are selling one or more of our businesses to someone to whom we may transfer our rights under any customer

If one of these organisations is outside of the European Economic Area we will take steps to make sure they agree to apply the same level of protection of your information as we are required to apply in the UK.

## **THE LEGAL BASIS FOR PROCESSING PERSONAL DATA**

The use of your information set out above is permitted under EU data protection law on the basis of these principal legal grounds:

- where you have consented to the use
- where necessary to enter into or perform our contract with you
- where we need to use it to comply with our legal obligations
- where we use it to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights
- where necessary for us to defend, prosecute or make a claim against you, us or a third party

## **INFORMATION WE MAY SEND TO YOU**

We will only send you communications by email or other electronic means if you give us your agreement to do so. For example, we may inform you that when providing your email address, you will be indicating your agreement to receive marketing emails. If you give us your agreement and subsequently wish to opt out, you can do so by clicking the unsubscribe link which we include on all our marketing emails or you can contact us at any time at the address above.

We may use your information to contact you with news about products and services provided by Hurst Doors (Hurst Plastics Ltd) which may be of interest to you and occasionally for market research purposes.

We may also share your information to our authorised Installer network or sales agents, and our other business partners for the purposes of completing enquiries.

We, and these other parties, may contact you by post and phone and, if you give us your prior agreement to do so, by email and other electronic means.

You can opt out from receiving marketing communications from us on our products and services at any time by writing to us at the above address.

## **WHO HAS ACCESS TO YOUR INFORMATION?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for their marketing purposes.

Third Party Service Providers working on our behalf.

- We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service, and we have a contract in place that requires them to keep your information secure and to not use it for their own direct marketing purposes.

Third Party Product Providers we work in association with:

- We work closely with various third-party product providers to bring you a range of quality and reliable products and services designed to meet the needs of commercial contractors, fabricators, installers, homeowners, landlords, architects, specifiers, builders, housing associations and local authorities. When you enquire about or purchase one or more of these products, the relevant third-party product provider will use your details to provide you with information and to carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third-party product providers will share your information with us which we will use in accordance with this Privacy Policy.

Please note if you purchase a product or service from an authorised installer or sales agent or otherwise give your information to an authorised installer or sales agent, you will have a separate relationship with the installer or sales agent in relation to their use of your data. If you have any queries relating to their use of your data, you will need to contact them directly to request how they process and use this information.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party, or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## **HOW LONG DO WE HOLD PERSONAL DATA?**

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

## APPROPRIATE SAFEGUARDS TO ENSURE PERSONAL DATA IS KEPT SECURE

- Security precautions are in place to protect the loss, misuse or alteration of your information.
- When you give us personal information, we take steps to ensure that it's treated securely. Non-sensitive details (e.g. your email address) are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure that is stored in a secure environment within our systems. The servers that hold data are maintained and patched regularly against threats.
- Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.
- We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## HOW TO ACCESS AND UPDATE YOUR INFORMATION

### Your rights as an Individual

It is important that you understand what your rights are as an individual.

- **Right to Erasure**

You may request that Hurst Doors (Hurst Plastics Ltd) erases your personal data and we will do so within 24 working hours. To avoid the possibility of re-adding your personal data again in the future, we will retain your name and email address (if available). You may request that we add your personal data back on to the database at any time.

- **Right to Request Rectification**

The accuracy of your information is important to us. If you determine that the personal data, we hold about you is incorrect you have the right to request rectification. We will immediately consider the request and rectify any errors found. To update your details, please email us at: [updatedetails@hurstdoors.co.uk](mailto:updatedetails@hurstdoors.co.uk), or write to us at the address above.

- **Subject Access Request**

At any point, you have the right to submit a Subject Access Request. Within a month period, we will respond to the request made. We will not charge a fee for any of the requests above unless the request is 'manifestly unfounded or excessive'. We also reserve the right to withhold personal data if disclosing it would 'adversely affect the rights and freedoms of others.'

If you have a complaint about how we have handled your personal data please write to the Data Protection Officer, Hurst Group Northern Ltd, Aynsley House, Common Road, Low Moor, Bradford, West Yorkshire BD12 0UF.

## LINKS TO OTHER WEBSITES

Our websites may contain links to websites run by other organisations. This privacy policy only applies to our websites, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites, even if you access them through links from our websites.

In addition, if you linked to our websites from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

## TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

## REVIEW OF THIS POLICY

We keep this Policy under regular review. This Policy was last updated in June 2019.