



Privacy Notice

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we may process about you and your rights regarding your data.

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

- We do:** use your personal data to help us provide a great experience for you.
- We do:** respect your privacy and work hard to ensure we meet strict regulatory requirements.
- We don't:** sell your personal data to third parties.

We'll always protect your personal data and, as part of this, we regularly review our privacy notice so that you can see how we use your data and what your options are. If there are any further changes to the 'General Data Protection Regulation' (or GDPR) or related laws, we may need to amend this statement in the future.

DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

TYPES OF DATA HELD

We will collect and use your personal data (this means any information which identifies you, or which can be identified as relating to you personally, such as your name, address, phone number, email address). We'll only collect the personal data we need and we'll make it clear at the point of collection why we are collecting it.

We may automatically collect information as you use our digital services such as the website. This may include the pages you have visited, information about the device or browser you are using, and any errors you encountered.

CCTV

Our registered office and workshop location have Closed Circuit Television (CCTV) and you may be recorded when you visit them.

CCTV is used to provide security and protect both our staff and visitor. CCTV will only be viewed when necessary (for example, to detect or prevent crime) and footage is stored for a set period of time, after which it is recorded over. HG Surface complies with the Information Commissioner's Office CCTV Code of Practice and we put up notices so you know when CCTV is used.

HOW WE USE YOUR PERSONAL DATA

We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation and Privacy of Electronic Communication Regulation.

We will use your personal data for the purpose or purposes outlined at the time you gave it to us. This may have been during the course of an enquiry, or when simply visiting our website.

We use this information:

- to provide the service, product or essential information you expect from us
- where you have given us your consent to do so, to keep you informed about our latest offers, products or projects
- to enable trusted partner organisations to perform services on our behalf
- to better understand how we can improve our services for you

We may also need to provide your personal data if we're asked by the police, or any other regulatory or government authority investigating suspected illegal activities.

Below are the main ways we will use your data. These all depend on the nature of our relationship with you and how you interact with and use our various services, websites and activities.

Providing our services to you; we use the personal data you provide to fulfil our services to you. This includes posting samples, providing information about our services, and sending current relevant information via email.

Our digital services; YouTube API services

We use YouTube API services to display video across our website. By using our website, you agree to be bound by the YouTube Terms of Service.

Find out more information on Google Privacy policy

HOW WE SHARE YOUR DATA

We will not sell your personal information to a third party.

We may share your information with partners to allow them to perform services on our behalf. Where applicable we have contracts in place with our suppliers, which require them to comply with the General Data Protection Regulation and The Privacy and Electronic Communications Regulations (or PECR), and to have robust systems and processes to protect the security of your information.

We may provide your email address to digital advertising or social media companies who work on our behalf, such as Facebook and Instagram. This is so we can reach you and others like you with information about how you can support our cause. This data is always provided in an encrypted format and is deleted immediately after use. If you don't want to see targeted advertising from us on social media, please refer to the instructions provided by the social media site, for example on Facebook, Instagram, Twitter and Google.

Below are some examples of the types of organisations with which we may share your data:

- Advertising partners – to enable us to ensure our advertising is relevant to the recipients.
- Analytics partners – to enable us to track the effectiveness of our website or mobile apps.
- Social media partners – so that we can effectively communicate with our supporters on social media platforms.
- Website and app partners – to help us develop websites and apps that give our customers the best possible online experience.

For further detail on the processes used to share your information please refer to our cookie policy.



Cookies and links to third party websites

Cookies

Cookies are small text files stored on your computer when you visit certain websites. We use first-party cookies (cookies that we have set, that can only be read by our website) to personalise your online experience. We also use third-party cookies (cookies that are set by an organisation other than the owner of the website, in this case HG Surface) to help us measure and analyse the use of our website and to provide targeted advertising. You can control the use of cookies via your browser. You can find further information in our cookie policy.

How do I change my cookie settings?

Cookies can be controlled by your web browser settings. Whether our cookies are used will depend on your browser settings, so you are in control. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit your web browser settings.

Links to other websites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, they will have their own privacy policies for which we do not accept any responsibility or liability.

Marketing communications

If you agree to receive marketing information from us you can always change your mind at a later date. For more on withdrawing your consent, please see the information in the section under Your data protection rights. We'll never share your information with companies outside HG Surface who want to use it for their marketing.

HOW WE SECURE YOUR DATA

We want to keep our customers and contractors safe, so the security of your data and of our information systems is incredibly important to us.

External threats to our data security are changing all the time, so we have a robust process for assessing, managing and protecting all of our new and existing systems to ensure they are up to date and secure.

When you trust us with your data we will keep your information secure to maintain your confidentiality.

Whenever your information is stored or transferred, we use strong encryption to minimise the risk of unauthorised access or disclosure.

Storing information

HG Surface operations are based in the UK and we store your data within the European Union (EU).

Payment card security

HG Surface has an active PCI-DSS (Payment Card Industry Data Security Standard) compliance programme. This is the stringent international standard for safe card payment processes. As part of our compliance, we ensure that our IT systems do not directly collect or store your payment card information, such as the full 16-digit number on the front of the card or the security code on the back.

PROTECTING YOUR DATA.

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Disclosing and sharing information

We do not sell or share your personal information for other organisations to use.

When we allow third parties acting on behalf of HG Surface to access your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it.

Where necessary, we may share the personal data we collect and process with:

- Third party research organisations
- Third party IT providers, for example who host the website or provide IT support

Also, under strictly controlled conditions, we will share personal data with:

- Contractors
- Service providers
- Advisors
- Agents.

We may also disclose your personal information to third parties in order to comply with a legal obligation, or to enforce other agreement. It may also be used to protect the rights, property or safety of HG Surface. This includes exchanging information with other companies and organisations to protect against fraud.

KEEPING YOUR INFORMATION

We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

YOUR DATA PROTECTION RIGHTS

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights. Where we decide how and why personal data is processed, we are a data controller and have provided further information about the rights that individuals have and how to exercise them below.

Access to personal data

You have a right of access to personal data held by us as a data controller. This right may be exercised by emailing us at lauren@hgsurface.com.

You may be asked to provide the following details:

- The personal information you want to access
- Where it is likely to be held
- The date range of the information you wish to access.

We will need you to confirm your identity. If we hold personal information about you, we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits (30 days). This timeframe may be extended by up to two months if your request is particularly complex.



OTHER DATA SUBJECT RIGHTS

This privacy policy is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and amendment referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion ('right to be forgotten'), to restrict or object to our processing of personal data and the right to data portability. There may be other legal reasons why we need to process your personal data, but please tell us if you don't think we should be using it. If you wish to exercise any of these rights, please send an email to lauren@hgsurface.com

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MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Lauren Siddons

lauren@hgsurface.com