

PRIVACY NOTICE



James Halstead plc is committed to ensuring that your privacy is protected. This notice explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This notice should be read in conjunction with our Terms of Use.

Any questions regarding this notice and our privacy practices should be sent by email to enquiries@jameshalstead.plc.uk and marked for the attention of the Company Secretary.

Who we are

This website is operated by James Halstead plc, of Beechfield, Hollinhurst Road, Radcliffe, Manchester M26 1JN, United Kingdom (company number 140269) referred to in this privacy notice as "we" or "us" or "Halsteads".

This Privacy Notice sets out how we will treat any personal information that you provide to us or that we collect from you when you visit our website.

Halsteads respects your right to privacy and will only process personal information you provide in accordance with all applicable data protection legislation.

For the purpose of the Data Protection Act 2018 and the General Data Protection Regulations ("GDPR") the data controller is James Halstead Plc. We are registered with the Information Commissioner's Office ("ICO") as a data controller with reference number Z5706724.

Information we collect from you and how it is used

We may collect the following information from you:

<u>Information that you provide to us:</u> such as when you complete forms (e.g. newsletter signup, contact, enquiry, support request, surveys). This may include information such as your name and contact details.

<u>Information we collect automatically</u>: currently, we do not use cookies on this website so no personal data will be automatically collected.

Typically, where we process your personal data it will be because we have a legitimate interest in operating our business and this website, promoting our products and services, to assist you with your enquiry, or because you have consented to our use of your personal data.

Third-party use of information

We will only disclose your personal information in accordance with applicable data protection laws and regulations. We may share your personal information with third parties in the following circumstances:

- We may share your personal information with other companies within the Halstead Group for administration purposes or, where you have agreed, for the purpose of sending you updates about the Halstead Group. If we do this, they will use your information in accordance with this privacy notice.
- Where we are using a third-party service provider to provide us with services (for example, to operate this website or send marketing alerts). If we do this, we contractually require them to apply appropriate safeguards for personal information.
- Where we are under a legal, regulatory or professional obligation to disclose your personal information, or in order to enforce or apply our Terms of Use.
- We may pass you contact details on to one of our authorised distributors where relevant to assist you with your enquiry.

Some of these third-parties may be located in countries outside the European Economic Area ("EEA"). We will only share data outside of the EEA when there are adequate safeguards in place to protect your personal information or it is otherwise lawful to do so.

If a third-party acquires all (or substantially all) of Halsteads business and/or assets, we may disclose your personal information to that third party in connection with the acquisition.

Except as described above, we will not disclose, sell or rent your personal information to any third-party unless you have consented to this. If you do consent but later change your mind, you may contact us to ask for any such activity to stop by emailing us at enquiries@jameshalstead.plc.uk or using the contact page on this website.

Security and Information Retention

Whilst Halsteads takes appropriate technical and organisational measures to safeguard the personal information that you provide, no transmission over the internet can ever be guaranteed secure. Consequently, please note that the security of any personal information that you transfer over the internet to us cannot be guaranteed.

We will keep your personal data for as long as is reasonably necessary to fulfil the purposes for which we collected it. However, we take steps to regularly review our information to ensure that we are not holding data for longer than necessary. There are a number of factors which influence the length of time that we hold data, including:

- legal requirements
- managing our legal risk
- managing our business

• our relationship with you

Where you enter into a contract with us, we would normally hold your information for six years after the end of that contract with you.

Where we no longer have a need to keep your information, we will delete it.

Your rights

Under data protection legislation you have a range of rights relating to your personal information, including the right to object to, restrict and/or withdraw your consent to the processing of your personal information, the right to access your personal information, and the right to receive a digital copy of your personal information.

In addition, you have the right to ensure that we correct or delete any inaccurate or out of date personal information which we have about you. If you believe that any personal information which we have about you is inaccurate or out of date and you would like us to correct or delete it, or you wish to exercise any other of your rights, please contact us at enquiries@jameshasltead.plc.uk. We attempt to respond to legitimate requests within 1 month. If your request is particularly complex, or you have made more than one request, we may extend the time to comply with your request. In this situation, we will notify you and keep you updated.

You have the right to contact the Information Commissioner's Office, if you think we have processed your personal information in a manner which is unlawful or breaches your rights. The ICO can be contacted in writing at Wycliffe House, Water Lane, Wilmslow, SK9 5AF or by telephone 0303 123 1113. Additional information about the ICO can be found on their website at www.ico.org.uk

If you have any concerns about the way that we are using your personal information, we request that you initially contact us at enquiries@jameshasltead.plc.uk so that we can investigate, and hopefully resolve, your concerns.

Third-party sites

The website may contain links to other websites operated by third-parties. Please note that this privacy notice applies only to the personal information that Halsteads collects through the website and we will not be responsible for personal information that third-parties may collect, store and use through their website. You should always read the privacy policy of each website you visit carefully.

Changes to this Privacy Notice

James Halstead plc may change this notice from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

Updated: April 2019