



HDC (EDUCATION GROUP) LTD

PRIVACY NOTICE.

1. INTRODUCTION

HDC (Education Group) Ltd are committed to ensuring that your privacy is protected and we strictly adhere to the provisions of the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) and compliant with the EU General Data Protection Regulation (GDPR), which comes into force on the 25th May 2018.

HDC (Education Group) Ltd are dedicated to storing all sensitive information as securely as possible, ensuring a safe and comfortable experience for all customers. HDC (Education Group) Ltd processes data in accordance with the General Data Protection Regulation (GDPR) 2018.

This privacy notice provides you with details of how we collect and process your personal data through your use of our website and other means. (www.hdc-uk.com)

By providing us with your data, you warrant to us that you are over 13 years of age.

HDC (Education Group) Ltd is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Our Contact Details

Our full details are:

Full name of legal entity: HDC (Education Group) Ltd.

Email address: sales@hdc-uk.com

Full Postal address:

HDC (Education Group) Ltd
Unit 2 Maritime Court,
Cartside Avenue,
Inchinnan Business Park,
INCHINNAN.
Renfrewshire.
PA4 9RX.

Telephone number: 0141 812 0199

Fax number: 0141 812 6699

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes, or if you want us to remove your data, by emailing us at sales@hdc-uk.com

2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUNDS WE PROCESS IT.

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

Customer Data that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

User Data that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website and marketing content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy – or to get in touch with you about a product you've previously ordered that you may want to repurchase or inform you about discounts or new specifications available on that product, based on your legitimate interest as a previous customer of that product. We also operate our email marketing strategy based on the grounds of consent in that our marketing emails will only be sent to you if you have provided GDPR compliant consent beforehand.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business and also deliver information about our products to you that you have previously shown an interest in purchasing. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us directly at sales@hdc-uk.com In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

3. HOW WE COLLECT YOUR PERSONAL DATA AND HOW DO WE USE IT?

We may collect data about you by you providing the data directly to us (for example by filling in forms on our website, sending us emails, communicating via telephone, by fax, by post, engagement with us at trade shows or exhibitions, face to face meetings or meetings via Skype or similar electronic meeting facility). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our [cookie policy](#) for more details about this.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, Twitter based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Data collected will be used solely for the purposes of sales, production, special offers and the marketing of new and existing products and will be stored securely on our internal server with restricted access. We may also share data with our associated organisations or business partners for administrative or production purposes (under strict service level agreements).

From time to time, we may also use your information to contact you for market research purposes. We may contact you by e-mail, phone, fax or mail. We may use the information that you give to customise our website according to your interests and improve products and services that we offer.

4. MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if;

- i. You made a purchase or asked for information from us about our goods or services or
- ii. You agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.

Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

We do not share, sell or distribute your personal data with any third party for their own marketing purposes.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by emailing us at sales@hdc-uk.com at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions such as purchases, enquiries or warranty registrations etc.

5. DISCLOSURES OF YOUR PERSONAL DATA

We *may* have to share your personal data with the parties set out below:

- i. Service providers who provide IT and system administration services (including technical support, call answering and marketing services) to us as a company.
- ii. Professional advisers including lawyers, bankers, accountancy auditors and insurers.

- iii. Government bodies that require us to report processing activities.
- iv. Third parties from which we purchase products or services in order to deliver to you as a customer.
- v. Third parties on which we are included as part of a directory, and via whom we receive enquiries directly from you the customer.
- vi. Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Some of our third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA. (For example, Google Analytics)

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- i. We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- ii. Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- iii. If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

7. DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

8. DATA RETENTION

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.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, and if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and, where the lawful ground of processing is consent, to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at sales@hdc-uk.com with the details of what you would like us to do with your data.

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 or refuse to comply with your request in these circumstances.

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.

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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you amicably and speedily.

10. THIRD-PARTY LINKS

Our website *may in the future* include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We would not control these third-party websites and would not be responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. COOKIES

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 our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Derek Young,
Data Protection Officer
HDC (Education Group) Ltd

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