

# DATA PRIVACY POLICY

This is the website privacy & cookies policy for the **Haldane Shiells Group (The Group)** and its subsidiaries. The Group take your privacy seriously and are fully committed to handling the information we collect from you in a secure and responsible manner and adheres to the guidelines published in the United Kingdom Data Protection Act and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25<sup>th</sup> May 2018.

Any questions relating to this privacy policy should be sent to:

[datamanager@haldane-shiells.com](mailto:datamanager@haldane-shiells.com)

Please read this privacy policy, which explains how we use your personal information, in particular:

- What information is collected from you through our trading website/s
- How the information is used and consent
- With whom the information may be shared
- How you can correct any inaccuracies in the information

## **General**

When you register with the any of the Group websites you may be asked for the following details:

- Name
- Address
- E-mail address
- Contact telephone number
- Further product information regarding sales and duty of care

We will then keep your details safely and will not sell or rent your details to third parties.

We will only share your information in the way described in this statement.

## **Use of Your Data**

The Group may pass your data to our select number of finance partners if you request finance.

The Group may use your personal details to contact you about news and special offers that we think may be of interest to you as part of the contractual and consent process.

If you wish to subsequently amend your consent, please e-mail the Data Manager at: [datamanager@haldane-shiells.com](mailto:datamanager@haldane-shiells.com)

Please also use these contact details to let us know if you would like us to delete any information from your records and we will do so at any time.

## **Personal Information, Collection and Retention**

The use of our website/s will result in the organisation receiving information from you. This will be used in examples of warranty and maintenance or when making online product purchases.

The organisation requires this information to provide our online services in order to purchase products at our outlets. We will detail this information below.

To make an online purchases, warranty and maintenance, we will require a Name, Address, Contact Number and Product information.

As part of our duty of care we may contact you with reference to warranty and maintenance reminders. The Group may use your personal information for general marketing purposes as part of the contractual or consent process.

If you subsequently wish to amend your consent on general marketing, warranty and maintenance reminders then please request that by sending an email to [datamanager@haldane-shiells.com](mailto:datamanager@haldane-shiells.com) or a written request to:

**The Data Controller  
Haldane Shiells Group  
Shepherd's Way  
Carnbane  
Newry  
BT35 6QQ**

#### **The Data Controller**

If you search through our product offers then we may store information on the products searched for and your postcode that is used to personalise the results that are returned to you.

Please be aware that if you call any of our outlets owned by the Group that your calls may be monitored or recorded for training purposes.

When you visit our outlets, we use **CCTV** to monitor our premises in this event your image and your vehicle registration can potentially be stored for a period of up to **8 weeks**.

If you wish to obtain finance as part of the requirements of purchasing our products we will be required to collect further details for finance and credit search purposes. These are;

- Name
- Email
- Address
- Length of time at present address
- Previous address (if you have been at your current address less than 3 years)
- Date of Birth
- Gender
- Full UK driving licence
- Marital status
- Dependants

This information will be passed to the finance provider and recorded on their finance system. Your personal information will be stored on your order form, which may be retained for **7 years** after which it will be deleted.

Our data retention periods are reviewed on a regular basis and we will only hold your personal information as long as it is deemed relevant for the required activity or as required for legal reasons or as stated in any relevant contract that we have in place with you.

### **Marketing**

The Group may contact you with reference to our duty of care for safety, warranty and maintenance based compliance OR where there is a contractual reference for us to do so.

If you have agreed to receive marketing from us by form of consent you will have the option to select which form of marketing you would like to receive. You may choose to amend your consent to receive such marketing from us and you can do this by sending an email to [datamanager@haldane-shiells.com](mailto:datamanager@haldane-shiells.com) to change and remove the methods you wish to be contacted by.

If you have agreed to receive marketing from the Group we may inform you of new products and promotional events available from companies within our organisation.

### **HR**

The Group may retain the following records;

Application forms and interview notes (unsuccessful candidates) - 12 months.

Bank details – 12 months after employment ceases

Personnel files and training records - 6 years after employment ceases

Redundancy details – 6 years after employment ceases.

Pension records – 12 years after benefit ceases.

### **Tracking**

We track your movements on the website to analyse trends and public interest in our products and services, administer the site and gather information for aggregate use. The information we gather in this way is anonymous and is not linked to personal information from which you can be identified.

### **Sharing**

We share information within the Group of companies in order to offer you the full range of our services, but your personal data is not disclosed to any third parties outside the Group without your consent. If you consent to a credit search with respect to a finance application then we will be required to submit your information outside of the group. This information will not be used for any other purpose other than to obtain a credit limit, which we will communicate, to you.

### **Manufacturers**

We share information with the manufacturers in line with our retailer agreements and with respect to safety and compliance specifications. If you wish to obtain a list of these manufacturers please contact the Data Controller.

If your enquiry leads to the purchase of a new product for the purposes of warranty, maintenance and safety compliance we will share this information with the respective manufacturer.

### **Safety and Compliance**

For warranty, maintenance and product safety requirements contacts will be made to our customers from the manufacturer or HALDANE SHIELLS GROUP.

### **Data Security**

You should be aware that the transmission of information via the Internet is not completely secure although we will use our best endeavours to protect your personal data. We cannot guarantee the security of your data in transit.

After receiving your information The Group will use clear procedures and security features to try to prevent unauthorised access.

We will never ask you to email your bank details, usernames, passwords, or ask you through an email or text for personal banking information. If you suspect you have become a victim of fraud please report this instance to the police. We would also recommend contacting the Information and Commissioners Office (ICO) via the website -[www.ico.gov.uk](http://www.ico.gov.uk).

### **Access to information**

You may request a copy of your personal information that the company holds about you at no cost by completing a "Data subject access request form". If you wish to access or update your personal information please contact HALDANE SHIELLS GROUP by sending an email to [datamanager@haldane-shiells.com](mailto:datamanager@haldane-shiells.com) or a written request for a form to:

**The Data Controller  
Haldane Shiells Group  
Shepherd's Way  
Carnbane  
Newry  
BT35 6QQ**

If you wish to remove any of the personal information the company holds please request this by email or writing to the above address to complete a "Right to be Forgotten Form". However, if personal information relates to any legal reasons it may be removed before being provided to you.

Both forms can be obtained by emailing the [datamanager@haldane-shiells.com](mailto:datamanager@haldane-shiells.com) or writing to the data

If there are any concerns that we are not using your information in accordance with our processes and with legal precedence or you are not satisfied with our response to a data request that you have made you can refer to the 'Information Commissioners Office (ICO)' - [www.ico.gov.uk](http://www.ico.gov.uk).

### **HALDANE SHIELLS GROUP - Company Information**

<b>Company</b>	<b>Co. No.</b>	<b>Trading Names</b>	<b>Registered Address</b>
Haldane Fisher Ltd	NI24075	Haldane Fisher Plumbmaster Bathline	Shepherd's Way Carnbane Newry BT35 6QQ
G E Robinson Ltd	2940692	G E Robinson Haldane Fisher Craven Timber	Montford Street Salford M50 2XD
Haldane Fisher	108887C	Haldane Fisher	Isle Of Man Business Park,

(Isle of Man) Ltd			Cooil Road, Douglas IM2 2QY Isle of Man
Key Hardware	NI072637	Key Hardware Ltd	Shepherd's Way Carnbane Newry BT35 6QQ

**Disclosure of information**

The Group may disclose your personal information to other members of our organisation as described above.

We may disclose your personal information to other parties in the event of:

- If we sell any of our businesses we may disclose your personal information to the prospective buyer of the relevant business.
- In the event of a duty of disclosure due to compliance with legal obligation then your personal information may be shared. E.g. Non-payment of debt
- In order to enforce or to comply with our terms and conditions of use for non-compliance.
- Data may be shared with other organisations for purposes of fraud protection and credit risk reduction.
- In the event of a data-cleansing organisation being sourced under contract to ensure accuracy of data information.
- Use of live chat and phone calls your information may be collected and shared with our third party providers.

**Cookies**

**We use cookies to make this website as useful to you as possible.**

Cookies are small text files that we put in your browser to track usage of our site (to improve and enhance it) but they do not tell us who you are. Absolutely no uniquely identifiable information is stored in any of our Cookies.

**What are cookies?**

A cookie is a piece of data/text file that is placed in your computer's memory when you visit a website. The information the cookie contains is set by our website's server and, depending on the type of cookie, may be used each time you visit our website/s.

Cookies are widely used to make our website/s work, or work more efficiently for you, our guest, as well as to provide companies with information about traffic through the website.

Cookies are designed to remember things that you have done on a website in the past, which can include putting products in your basket, logging in, or clicking on links. This can save you time when you visit a website more than once.

Cookies can be used by our website/s in the following ways:

- To remember your preferences.
- To remember your password.
- To find out what the website doesn't do well and make improvements to it in future.
- Allow you to share pages with social networks like Facebook.

- To make personalised product recommendations, based upon your previous times you've visited our website/s.
- Make sure advertising on other websites is relevant to you.
- They can also help us to see how many people are visiting our website and which pages are the most popular (see Google Analytics).

### **Advertising Cookies**

Our website uses cookies/advertising IDs for the purpose of advertising. This enables us to show our advertisements to visitors who are interested in our products on partner websites, apps and emails. Re-targeting technologies use your cookies or advertising IDs and display advertisements based on your past browsing behaviour.

Cookies are not dangerous. They are not computer programs and cannot be used to circulate viruses. They are not used to identify you personally.

### **Google Analytics**

This is a behavioural tracking service that shows us what pages people have visited, for how long and in what order. It also tells us whether people are using desktops or mobile devices to view the website, and other helpful information. This data helps us find out what can be improved on the website and how important it is.

### **List of Cookies**

Here is a list of the main cookies we use, and what we use them for on our website/s.

<b>Name</b>	<b>Purpose</b>	<b>Description</b>
PHPSESSID	User session ID	Cookie generated by applications based on the PHP language. This is a general purpose identifier used to maintain user session variables. A good example is maintaining a logged-in status for a user between pages.
cb-enabled	Cookie consent alert	This cookie is associated with a free script which shows a cookie alert notice on a website. It is used to record when the user has dismissed the notice to prevent it re-appearing on return visits.
_ga	Google Universal Analytics	This cookie name is associated with Google Universal Analytics. It is used to distinguish unique users by assigning a randomly generated number as a client identifier.
_gid	Google Universal Analytics	This cookie name is associated with Google Universal Analytics. This appears to be a new cookie and as of Spring 2017 no information is available from Google. It appears to store and update a unique value for each page visited.
_gat_UA-37170836-1	Google Analytics	This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it relates to.
_vwo_uuid_v2	Visual Website Optimiser	This cookie name is associated with the product Visual Website Optimiser. The tool helps site owners measure the performance of different versions of web pages.
__unam	ShareThis	This cookie is usually associated with the ShareThis social sharing widget placed in a site to enable sharing of content across various social networks.
__insp_norec_sess	Disqus comment plugin	A cookie used by the Disqus comment plugin ( <a href="https://disqus.com/">https://disqus.com/</a> )
__insp_nv	Disqus comment plugin	A cookie used by the Disqus comment plugin ( <a href="https://disqus.com/">https://disqus.com/</a> )

__insp_slim	Disqus comment plugin	A cookie used by the Disqus comment plugin ( <a href="https://disqus.com/">https://disqus.com/</a> )
__insp_targlpt	Disqus comment plugin	A cookie used by the Disqus comment plugin ( <a href="https://disqus.com/">https://disqus.com/</a> )
__insp_targlpu	Disqus comment plugin	A cookie used by the Disqus comment plugin ( <a href="https://disqus.com/">https://disqus.com/</a> )
__insp_wid	Disqus comment plugin	A cookie used by the Disqus comment plugin ( <a href="https://disqus.com/">https://disqus.com/</a> )

You can at any time refuse the use of cookies.

### **IP Addresses**

The additional cookies that run during your session will collate information regarding your computer in the form of server logs including where available your IP addresses, operating system, browser types regarding your systems administration.

This is for the purpose of statistical data. Disabling cookies ensures that your IP address will not be recorded. You can update your cookie preferences in your browser settings. Please note that disabling cookies will ensure that your IP address will not be recorded.

HALDANE SHIELLS GROUP would request that the cookies are accepted, as they are used for:

- Customisation of the website layout and content.
- Recognition of when a user has visited and how many unique visits are received.
- Remembering your preferences and settings.
- Recognition of devices so the same information is not needed on every visits to the website.
- Identification of errors for resolution.
- Identification of what is relevant whilst browsing the website.
- Collation of statistical and anonymous information around the use of our digital services.
- Effectiveness of our website and online message.

### **Links**

The Websites associated with HALDANE SHIELLS GROUP may contain links to and from the websites of our partner networks and manufacturers.

In the event of you following these links, these websites will have their own privacy policies and HALDANE SHIELLS GROUP does not accept any responsibility or liability for these policies.

HALDANE SHIELLS GROUP would advise that you check these policies before you submit any personal information to these websites.

### **Social Networks**

The Websites associated with the HALDANE SHIELLS GROUP may offer you opportunity to share or follow information about the business using third party social networking functionality; share this, like or follow buttons.

We offer this functionality in order to generate interest toward our website and services among members of your social networks.

You should be aware that sharing personal information within a social network may result in that information being collected by the social network provider. This could result in that information becoming publically available in internet search engine results.

We do not exercise or endorse controls, policies or practices on any third party social network that you may access through our websites.

Please read the privacy policy on any social network with which you may share information with.

**Jurisdiction - Data storage for use in the EU and third countries**

HALDANE SHIELLS GROUP stores your data on secured servers inside the EU and third countries (e.g. Isle of Man). Most of our partner networks are mainly based within the EU and third countries. If any data is stored outside the EU and third countries it will be documented.

We have a clear data policy in place regarding the submission of your personal information. This will cover consent to transfer, storing or processing your personal information and data.

In the event of this instance HALDANE SHIELLS GROUP will take steps to ensure that the required security measures are followed to protect data as per our data security policy.

You can read about the EU e-Privacy Directive and the UK's Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 at [www.ico.gov.uk](http://www.ico.gov.uk).

**We may update our privacy policy from time to time, so would advise that you check it each time you visit the website.**

**Date: April 2018**

**Review Date: April 2019**