



**LORDAN**  
BEYOND THERMAL  
ENGINEERING

LORDAN (UK) LTD. | Tel. 44(0) 1443 812222 | Fax. 44(0) 1443 812312 | Unit 1 North Road, Penallta Industrial Estate, Hengoed, CF82 7SS | [www.lordan-uae.com](http://www.lordan-uae.com) | Registered in England 4647792

## **LORDAN (UK) LTD Privacy Notice and Data Protection Policy for customers and others who we work with**

### **What is this policy for?**

We take issues relating to your personal data really seriously. This policy is to explain more to you about how we handle your personal data. We will always be clear about why we need the details we ask for and ensure your personal information or that belonging to any third party you give to us is kept as secure as possible.

We do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements the other notice and is not intended to override them.

This Policy is provided in a layered format, so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms.

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## **CONTROLLER**

LORDAN (UK) LTD is the controller and responsible for your personal data (in the case of individual customers) or your employees' personal data (in the case of employers) (collectively referred to in this policy as "we", "us" or "our")

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Policy. You should not hesitate to contact our Managing Director at our Registered Address.

Postal address: LORDAN (UK) LTD, Unit 1 North Road, Penallta Industrial Estate, Hengoed, CF82 7SS.

Telephone number: 01443 812222

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on May 25<sup>th</sup> 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

If you provide us with an email address that you share with another person (such as a partner), you can expect them to see any emails that we send to you.

## **THIRD-PARTY LINKS**

Our website may include links to other websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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We may collect, use, store and transfer different kinds of personal data about you or your employees which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery addresses, email address and telephone numbers.
- **Financial Data** includes bank account details where we e.g.: - make refunds to you of overpayments, make payments for supply of products and or services.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, and details of the devices you use to access our website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website article. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

#### **Special Categories of Personal Data and criminal records data**

We do not intend to collect such data about suppliers and customers.

#### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products and services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

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- **Direct interactions.** You may give us your Identity, Contact, Transaction and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Use our services;
  - Buy or products;
  - Request marketing materials or other information to be sent to you;
  - Enter a competition, promotion or survey; or
  - Give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your activity. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Another customer who has referred you to us
  - Another service provider who has referred you to us
- **Identity and Contact Data** from publicly available sources such as Companies House based inside the EU. For example, we may check Companies House to ascertain who the directors are of a company.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to.

We only process data for the purposes we have agreed with you or where it relates to:

- carrying out our duties as a supplier or customer with you/the organisation you work for (as applicable) - we need to use the data, in order to give the best service
- complying with legal requirements
- pursuing our legitimate interests (such as being able to communicate with you and update you regarding our products and services) and your interests and fundamental rights do not override those interests
- something necessary for the protection of a person's vital interests (this is likely to be exceptional but may related to someone's health in an emergency)
- something you have consented to
- data that has been made public by you

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to individual customers where marketing communications are sent to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

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## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please tell us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you  Legitimate interests (maintaining a Christmas Card list and management reporting.)
To check your identity	(a) Identity	Compliance with legal obligations
To carry out our business	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you where you are our customer  (b) Necessary for our legitimate interests where you are not our customer but the processing of your data is required for us to be able to carry out our services for our customer.

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<p>To process payment:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to manage our business and recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how you use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Transaction</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

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To maintain our systems	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant and targeted advertisements to you and measure or understand the effectiveness of the advertising we serve to you (only applicable to our employer clients)	(a) Identity (b) Contact (c) Transaction (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/ services and grow our business)
To refer you to other third parties where that is important to you	(a) Identity (b) Contact	We only ever refer you to a third party such as another supplier if you have expressly consented to us doing this.

We do not sell or share any data to other organisations.

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## **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### **PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

If you work for one of our employer customers, you will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when enquiring about similar services in the past and, in each case, you have not opted out of receiving that marketing.

If you are an individual, you will not receive marketing communications from us.

### **THIRD-PARTY MARKETING**

We do not share your personal data with any third parties for marketing purposes.

### **OPTING OUT (EMPLOYER CUSTOMERS)**

You can ask us to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase.

## **COOKIES**

We don't deliberately collect data about you using cookies, but our website is hosted using a content management system that may be collecting functional data in the form of cookies.

### **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that

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reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Other parties with the Lordan Group in order to carry out our legitimate business, who may also in turn pass information onto others for the purposes of completing a contract, eg. couriers for the delivery of products.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

For example, you might ask us to refer your contact details to outplacement consultants or pensions experts.

## **6. INTERNATIONAL TRANSFERS**

As a global company that is shipping product all over the world and providing services to Global customers and suppliers we do on occasion have to provide data outside the EEA. We only do so where we are satisfied that who we are sharing data with abide by high standards of data protection.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees,

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agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **8. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our clients (including Contact, Identity, Financial, Advice and Transaction Data) for six years after they cease being customers for tax, insurance and regulatory purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)

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- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact us.

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you that you have given to us and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a

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structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

#### **NO FEE USUALLY REQUIRED**

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. Alternatively, we may refuse to comply with your request in these circumstances.

#### **WHAT WE MAY NEED FROM YOU**

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.

#### **TIME LIMIT TO RESPOND**

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 and keep you updated.

### **10. GLOSSARY**

#### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any

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potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **THIRD PARTIES**

### **EXTERNAL THIRD PARTIES**

- Service providers based in the UK and abroad who provide IT and system administration services: generally, they are accessing our systems for the legitimate interest of diagnosing and dealing with IT related problems rather than accessing personal data. We are satisfied that our contractual relationships with those providers contains provisions for dealing with the security of all data and that take appropriate measures to prevent unlawful access to the data.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK and EEA who provide consultancy, banking, legal, insurance and accounting services to the firm.
- HMRC, as regulators they have the power to require access to any files we hold in order to ensure that we have operated accordingly. If they do so these regulators will have duties to you as a Data Controller in their own right and you should ask them for their Privacy Notice in this regard.
- Debt-collectors, based in the UK and EEA acting as joint controllers who will have access to Financial Data and Identity Data in order to enforce the debts you us.

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