



# DATA PROTECTION AND PRIVACY POLICY

Updated 4 June 2018





At TBA Electro Conductive Products Limited, we respect your privacy and are committed to protecting your personal data. This privacy notice outlines how we look after your personal data when you visit our website (<https://www.tbaps.com/>), sign up to our newsletter, purchase a product or service, or enter a competition.

In addition, we will also want to inform you of your rights under the new General Data Protection Regulations (GDPR) and the Data Protection Act 2018, which have replaced the Data Protection Act 1998.

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## Who are 'we'?

'We' encompasses both TBA Electro Conductive Products Limited and our trading name, TBA Protective Solutions.

This may also include third parties such as:

- Service providers based in the United Kingdom who provide IT and administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

Please note: We do not transfer personal data outside of the European Economic Area (**EEA**).

## Data: What, how and why we collect

With your permission, we may collect, use, store or transfer different kinds of information about you for the purposes of improving what we offer as a business. As a provider of goods and services, there are occasions where we need to collect and store personal data in order to process these transactions. This may include:

- **Identity:** first name, last name, username or similar identifier and title.
- **Contact:** billing address, delivery address, email address and telephone number.
- **Transaction:** details about payments to and from you or other details of products and services purchased from us.
- **Financial:** bank details or account contacts for the purposes of creating an account for invoicing. We may also carry out a credit search for financial due diligence, if we are to create a credit account.
- **Technical:** internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, operating system, the devices you use to access our website, and cookies. Wherever possible, we use or store aggregated data for the purposes of statistical analysis. This information is a risk-free way of gaining insights into trends and patterns, such as website analytics to improve the performance of our website.
- **Profile:** includes your login details, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage:** includes information about how you use our website, products and services.
- **Marketing and Communications:** you may receive marketing communications from us if you opted in to hearing more from us when you requested information, purchased goods or services, provided us with your details when you entered a competition, or registered for a promotion.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Reason for processing</b>
To register you as a new customer	(a) Identity (b) Contact	To carry out our contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) To carry out our contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (b) Profile (c) Marketing and Communications	(a) To carry out our contract with you (b) To keep our records updated (c) To study how customers use our products/services
Promoting special offers to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) To study how customers use our products/services (b) To help develop products/services (c) To grow our business
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) To help assist with running our business (b) Provision of administration, IT services, and network security (c) To prevent fraud restructuring exercise
To deliver relevant website content and advertisements to you. To also measure and understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) To study how customers use our products/services (b) To help develop products/services (c) To grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) To keep our website updated and relevant (b) To develop our business (c) To inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you. To provide you with technical information	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) To develop our products/services (b) To grow our business



Links to other websites:

Our website may 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 do not control these third-party websites and are not responsible for their privacy statements.

Change of purpose:

If we would like to use your personal data for a purpose other than stated above, we will notify you to seek consent to do so.

### **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. In addition, access to your personal data is limited to only those essential to the reasons for collection, such as relevant employees, agents, contractors and other third parties (eg. delivery drivers). 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, in the unlikely event of a breach.

### **Data retention**

We will hold your personal data only as long as necessary to satisfy any legal, accounting, or reporting requirements. Where we have received your consent to send marketing material, we will hold your contact details until you unsubscribe or request removal. You can also use your browser settings to restrict data collected (such as cookies).

Opting out:

You can ask us to stop sending you marketing messages at any time by contacting us or clicking on the unsubscribe link at the bottom of any of our marketing communications.

Where you opt out of receiving these marketing messages, we may still hold personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions. You have the right to request your details be removed (right to be forgotten) but requesting to do so may impact any warranties or contracts you have with us. Please do get in touch to discuss in more detail if this is a concern.

### **Your legal rights**

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This is a request for a free copy of the personal data we hold about you and enables you to also request amends or removal, to be dealt with within a month of it being made. However, we may charge a reasonable fee if your request(s) is/are clearly unfounded, considered excessive or a request for further copies.

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 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 complete a contract with you.

You may withdraw consent at any time where we are relying on consent to process your personal data. However, 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 of your request.