

# Hammer PLC GDPR Privacy Statement

This privacy statement sets out:

- what information Hammer PLC collects from you and why;
- how Hammer PLC uses and protects any information that you give; and
- how you can access and manage your information.

Hammer PLC is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement.

Hammer PLC may change this statement from time to time by updating this page. We will make clear whenever any changes are made. This statement is effective from 25<sup>th</sup> May 2018.

## What we collect

We may collect the following information:

- name
- job title
- contact information including email address
- demographic information such as postcode, preferences and interests
- information relevant to specific customer offers and/or surveys which will be explained at the time.

## What we do with the information we gather

We require this information to understand your needs and provide you with a better service. In particular, we will use it for the following legitimate interests of our business:

- monitoring, recording and storing telephone or email communications for the purpose of internal training, to improve the quality of our customer service, and in order to meet any legal and regulatory requirements
- improving our products and services
- customising our website according to your interests
- periodically sending you promotional mails, emails or SMS messages about new products, special offers or other information which we think you may find interesting, using the contact details which you have provided
- use your information to contact you for market research purposes; and
- contact you by phone in relation to the above.

We will also use your information to manage our contractual relationship with you for:

- internal record keeping and account management purposes (e.g. verifying your identity and fulfilling orders you place); and
- contacting you by email, phone or mail for the purpose of account administration and/or processing and fulfilling orders.

If you contact us or we contact you, we may ask for certain information from you to confirm your identity, check our records and deal with your account efficiently and correctly.

Where we have asked for your consent to use your personal information for a particular purpose, this consent may be withdrawn by you at any time. Please see the section entitled 'Controlling your personal information' below.

### Security

The security of your information is very important to us. As part of our commitment to keeping your data safe, our technical experts maintain physical, electronic and managerial procedures to keep safe the information we collect online.

Only authorised employees and carefully checked agents, contractors and sub-contractors, who provide a particular data processing service for us, are permitted access to your data. These people will only be allowed access to your data for the purposes identified within this Privacy Policy, processing it on our behalf or for IT security and maintenance.

If a third party processing your data on our behalf is located in a non-EU country that does not have data protection laws equivalent to those in the EU, we will always take appropriate additional steps to ensure that your personal information is kept safe and secure by those processing your data on our behalf. This will generally involve ensuring that such third party agrees to sign up to a formal legal agreement committing such party to comply with standards equivalent to those that would apply where that party to be located within the EU.

We aim to protect all of our customers from fraud. As part of this, we may use your personal information to verify your identity to help prevent or detect fraud. These checks may involve your information being disclosed to credit reference agencies, who may keep a record of that information. This is not a credit check and your credit rating will be unaffected.

Sometimes, you might wish to disclose sensitive information to us, for example if you need a priority delivery because you are receiving medical treatment. We will only use sensitive data for the specific reason you disclosed it to us and we will take extra care to keep it secure. From time to time, we will check with you that we may continue to use that sensitive data for the specified purpose. We will re-check this consent on a periodic basis. In either case, you may withdraw your consent at any time.

### How long we hold your information for

The time period for which we keep information varies according to what we use the information for. Unless there is a specific legal requirement for us to keep information, we will keep your information for as long as it is relevant and useful for the purpose for which it was collected.

Where we are using your personal information to send you marketing information, we will retain that for 12 months – as we understand that you will not buy from us on every occasion, but frequently we see repeat purchases from customers in this time period. We will retain your account information for 7 years in line with relevant tax and contract requirements.

You are entitled to request that we erase your personal information at any time, for example where you cease to be an active customer of ours. Whilst we will generally seek to comply with your request, there will be circumstances where we are entitled to retain such personal information (e.g. in respect of legal claims).

## Controlling your personal information

You may choose to restrict or control the collection or use of your personal information in the following circumstances:

- when you are asked to fill in a form on the website or elsewhere (ensure that you do not tick any box which consents to our use of your personal information if you do not want us to use your personal information for those purposes)
- if you have previously agreed to us using your personal information for specific purposes and wish to change your mind
- if you wish for your personal information to be erased from our systems
- if you wish for us to transfer your personal information to a third party (e.g. another service provider). In this case, we will provide you with certain personal information held by us for you to pass to that third party (or, in certain circumstances, we may be able to transfer that data to such third party directly if you wish for us to do so).

You have the right to:

- know that information is being processed
- access information that is being processed
- rectification of information being processed
- erasure of information held on you (commonly known as the right to be forgotten)
- restrict processing
- be notified about what information has been rectified, erased and restricted
- portability (that is, to request your data be handed over to someone else)
- object to the processing of your information.

It is important to note that this is not an absolute right to review all the information that is held about you, as there are various exceptions to this right. These include:

1. where personal data is kept for the purpose of preventing, detecting or investigating offences and related matters; and
2. where the data is given by another person in confidence.

If you want to remove a consent or request erasure or transfer of your personal information, you may do so at any time by writing to us at Hammer PLC, Intec 1, Wade Road, Basingstoke, Hampshire, England, RG24 8NE, or email us at [dpo@hammerplc.com](mailto:dpo@hammerplc.com).

We will not sell, distribute or lease your personal information to third parties unless we have your permission, or are required by law to do so. Where we do seek your permission we will name the relevant third party at the time we seek such permission from you and any such permission shall be limited to that third party.

Sometimes we may have to pass information to statutory bodies authorised to obtain data under various legislation, such as the police or tax authority.

If you believe that any information we are holding on you is incorrect or incomplete, please write, email or call us as soon as possible, using the details set out above. We will promptly correct any information found to be incorrect.

To protect your privacy and security, we will take reasonable steps to verify your identity before granting access or making corrections.

This policy replaces all previous versions and is correct as of 25<sup>th</sup> May 2018. We reserve the right to change the policy at any time.