

Flotronic Pumps Limited Privacy Notice

Introduction

Welcome to Flotronic Pumps Limited Privacy Notice.

Flotronic Pumps Limited respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Important Information and Who We Are

Purpose of this Privacy Notice

This privacy notice aims to give you information on how Flotronic Pumps Limited collects and processes your personal data through the use of this website, and also (if you are a customer) where we provide you with a service or (if you are a service provider) where you have provided us with a service.

This website is not intended for children and we do not knowingly collect data relating to children.

Controller

Flotronic Pumps Limited is the controller and responsible for your personal data (collectively referred to as "Flotronic Pumps Limited", "we", "us" or "our" in this Privacy Notice).

Contact Details

If you have any questions about this Privacy Notice or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity:	Flotronic Pumps Limited
Company number:	2559708
Email address:	Sales@flotronicpumps.co.uk
Postal address:	Flotronic Pumps Limited, Ricebridge Works, Brighton Road, Bolney, West Sussex, RH17 5NA.
Telephone number:	+44 (0)1444 881871

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). 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

We keep our Privacy Notice under regular review. This version was last updated on 03-06-19

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.

Third-party links

This 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. When you leave our website, we encourage you to read the privacy policy for every website you visit.

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).

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

- **Identity Data** includes first name, last name, username or similar identifier and title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us if you are a customer or that we have purchased from you if you are a supplier.
- **Technical data** includes internet protocol (IP) address, your login data, browser type and version, time zone and location, browser plug-in type and versions, operating system and platform, and any other technology on the devices you use to access the website.
- **Profile Data** includes you username and password, purchases or orders made by you.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** where you are the customer includes you preferences in receiving marketing from us and our third parties 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 the data will 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 feature. 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 Notice.

We do not collect any ***Special Categories of Personal Data*** about you (this could include details about you race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How Is Your Personal Data Collected?

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

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you may provide when you:

- Order our products or services
- Provide goods or services to us
- Request marketing to be sent to you
- Give us feedback or contact us

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:

- Analytics providers (such as Google based outside the EU).
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services (such as Risk Disk that could be based both inside and outside the EU)
- Identity and Contact Data from publicly available sources (such as Companies House and the Electoral Register based inside the EU).

How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party including but not limited to our finance providers) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of most of 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 contact 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 following table.

Purpose/Activity	Type of Data	Lawful basis for the processing including basis of legitimate interest
To register you as a new customer	Identity Contact	Performance of a contract with you.
To process and deliver your order including: Manage payments, fees and charges. Collect and recover money owed to us.	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you. Necessary for our legitimate interests (to recover debts due to us).

Purpose/Activity	Type of Data	Lawful basis for the processing including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <p>Notifying you about changes to our terms or Privacy Notice</p> <p>Asking you to leave a review or survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Marketing and Communications</p>	<p>Performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to keep our records updates and to study how customers use our products/services).</p>
<p>To order goods or services from you where you are our supplier</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p>	<p>Performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p>
<p>To manage our relationship with you where you are our supplier by retaining your details so that we can engage you for further supply of goods or services in the future.</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p> <p>Transaction</p> <p>Marketing and Communications</p>	<p>Performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to keep our records updated).</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>Identity</p> <p>Contact</p> <p>Technical</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context a business reorganisation or group restructuring exercise).</p> <p>Necessary to comply with a legal obligation.</p>

Purpose/Activity	Type of Data	Lawful basis for the processing including basis of legitimate interest
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Contact Profile Usage Marketing and Communications Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow the business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical Usage Profile Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).

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).

You will receive marketing communications from us if you have requested information from us or purchased goods from us and you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

When you opt out of receiving these marketing messages this will not apply to personal data provided to us as a result of a product purchase, warranty registration, product experience or other transactions.

Cookies

You can set your browser to refuse some or all browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purpose for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

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 accordance with the above rules, where this is required by law.

Disclosures of Your Personal Data

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

- External Third Parties including but not exclusively restricted to IT and System and finance providers.
- Administration services, Professional advisors including lawyers, auditors and insurers, HM Revenue and Customs along with regulators and other authorities.
- 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 the specified purposes and in accordance with our instructions.

International Transfers

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Certain countries outside the EEA, such as Canada and Switzerland, have been approved by the European Commission as providing essentially equivalent protection to EEA data protection laws and therefore no additional legal safeguards are required. In countries which have not had such approval, we will either:

- Ask for your consent to the transfer
- Transfer it subject to European Commission approved contractual terms that impose equivalent data protection obligations directly on the recipient unless we are permitted under applicable data protection law to make such transfers without such formalities.
- For US personal data transfers we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you require further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data Security

We have put in place appropriate security measures to prevent your personal data from being lost, used or accessed in an unauthorised way, altered or disclosed. In addition we limit access to your personal data to those employees, agents, contractors and other third parties who have a business to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have 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.

Data Retention

How long will we retain your personal data?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying and legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in the respect to our relationship with you.

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 purpose for which we process your personal data, whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In addition to this to enable us to support the product and customer in the future we may need to keep this data for up to 12 years.

We keep basic information about our suppliers (including Contact, Identity, Financial and Transaction Data) for six years after we purchase goods or services from them so that we can contact them if, for example, there are any issues with our previous purchase or to order further goods or services from them in the future.

In some circumstances we will 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.

Your Legal Rights

Under certain conditions you have the right to require us to:

- Provide you with further detail on the use we make of your information
- Provide you with a copy of your information
- Update any inaccuracies in the information we hold about you
- Delete any information about you that we no longer have a lawful ground to use
- Remove you from any direct marketing lists when you object or withdraw your consent
- Provide you with your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- Restrict our use of your personal information
- Cease carrying out certain processing activities based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime), our interests (e.g. the maintenance of legal privilege) and the rights of third parties.

If you are dissatisfied with our use of your information or our response to any exercise of these rights you have the right to complain to the Information Commissioner's Office which regulates the processing of personal data in the UK.