Welcome to Power Torque Engineering Limited's privacy notice.

Power Torque Engineering 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.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

## Purpose of this privacy notice

This privacy notice aims to give you information on how Power Torque Engineering Limited collects and processes your personal data.

It is important that you read this privacy notice together with any other privacy 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 privacy notice supplements the other notices and is not intended to override them.

#### Controller

Power Torque Engineering Limited is the controller and responsible for your personal data (collectively referred to as "Power Torque", "we", "us" or "our" in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Neil Haycock using the details set out below.

Our full details are:

Neil Haycock, Finance Director] neil.haycock@powertorque.co.uk Power Torque Engineering Limited Herald Way Coventry CV3 2RQ

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 any changes

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 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).

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

**Identity and Contact Data** includes first name, last name, title, billing address, delivery address, email address and telephone numbers.

**Financial and Transaction Data** includes bank account and payment card details, details about payments to and from you and other details of products you have purchased from us.

Technical and Usage Data includes internet protocol (IP) address and information about how you use our website.

Marketing and Communications Data includes your preferences in receiving marketing from us such as our

newsletter and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you. 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). In this case, we may have to cancel a product but we will notify you if this is the case at the time.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you purchase our products, subscribe to our newsletter or request marketing to be sent to you or to give us some feedback.

#### 4. 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) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to 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 using the contact details above.

# Purposes for which we will use your 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 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 table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Financial</li><li>(d) Transaction</li><li>(e) Marketing and</li></ul>	<ul><li>(a) Performance of a contract with you</li><li>(b) Necessary for our legitimate interests (to recover debts due to us)</li></ul>

To manage our relationship with you which will include:	(a) Identity	(a) Performance of a contract with you
<ul><li>(a) Notifying you about changes to our terms or privacy policy</li><li>(b) Asking you to leave a review or</li></ul>	(b) Contact (c) Profile	<ul><li>(b) Necessary to comply with a legal obligation</li><li>(c) Necessary for our legitimate interests</li></ul>
take a survey	(d) Marketing and Communications	(to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Technical</li></ul>	(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

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

# **Opting out**

You can ask us or third parties to stop sending you 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.

#### Cookies

You can set your browser to refuse all or some 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 purposes 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, unless required or permitted by law.

# 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with other parties for the purposes set out in the table in paragraph 4 above. These third parties could include debt recovery management companies or third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. 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 notice.

Other third parties could include the following:

Service providers who provide IT and system administration services.

Professional advisers including lawyers, bankers, auditors and insurers based who provide banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities.

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.

# 6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

### 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, 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

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. By law we have to keep basic information about our customers for six years after they cease being customers for tax purposes.

#### 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data which include the following:

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.

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 using the contact details above and we will usually try to respond in one month. In most circumstances you will not have to pay a fee to access your personal data (or to exercise any of the other rights). We may need to request specific information from you to help us confirm your identity in order 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.