

HYDROFIX WEBSITE PRIVACY POLICY

HYD-POL-020

1 AIM

Hydrofix Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, <https://www.hydrofix.co.uk/> (“Our Site”) and will only collect and use personal data when you visit Our Site (regardless of where you visit it from) in the ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law. This privacy policy supplements other notices and privacy policies and is not intended to override them.

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

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

2 DEFINITIONS

| Term | Definition |
|---------------|--|
| Cookie | a small text file of letters and numbers placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Cookies contain information that is transferred to your computer's hard drive. |
| Cookie Policy | HYD-POL-021 Hydrofix Website Cookie Policy |
| Our Site | www.hydrofix.co.uk |
| Personal data | Any and all data that relates to an identified or identifiable living person who can be directly or indirectly identified from that data. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual. In this case, it means personal data that you give to Us, or that We collect from you, via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”) |
| We/Us/Our | Hydrofix Limited, a company registered in England under company number 4713320, whose registered and main trading address is Worley Court 2, Bolesworth Road, Tattenhall, Cheshire CH3 9HW |
| Website User | The individual accessing the Hydrofix website (www.hydrofix.co.uk) |

3 RESPONSIBILITIES

| Role | Responsibility |
|----------------------|--|
| Data Privacy Manager | <ul style="list-style-type: none"> To ensure that a personal data is processed in accordance with Company and current legislation. To ensure that a review of documents and records is carried out at planned intervals the results of these reviews shall be communication to all interested parties. |
| Website user | <ul style="list-style-type: none"> Familiarise themselves with this policy. Notify Hydrofix as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future. |

4 POLICY

4.1 Information About Us

4.1.1 Our Site is owned and operated by Hydrofix Limited, a company registered in England under company number 4713320, whose registered and main trading address is Worley Court 2, Bolesworth Road, Tattenhall, Cheshire CH3 9HW. We are the controller and are responsible for your personal data.

4.1.2 We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Privacy Manager using the details set out below.

Full name of legal entity: Hydrofix Limited

Email address: DataPrivacyManager@hydrofix.co.uk

Postal address: Data Privacy Manager: Worley Court 2, Bolesworth Road, Tattenhall, Cheshire CH3 9HW

4.2 What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site 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. Please note that We have no control over these third party websites or how your data is collected, stored, or used by them. We are not responsible for the privacy statements of third party websites and We encourage you to read the privacy policies of every website you visit and certainly before you provide any data to them.

4.3 Your Rights

- Under certain circumstances, you have rights under data protection laws in relation to your personal data. The right of 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 and to check that We are lawfully processing it. (See section 4.9);
- The right to rectification if any personal data We hold about you is inaccurate or incomplete though We may need to verify the accuracy of the new data you provide to Us. (please contact Our Data Privacy Manager);
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you This enables you to ask Us to delete or remove personal data where there is no good

reason for 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. (please contact Our Data Privacy Manager);

- The right to restrict the 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.
 - (d) You have objected to Our use of your data but We need to verify whether We have overriding legitimate grounds to use it.;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation) - 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.
- The right to object to Us using 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.; and
- The right to withdraw your 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.

4.3.2 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

4.3.3 If you have any cause for complaint about Our use of your personal data, please contact Our Data Privacy Manager using the details provided in section 4.1.2 and We will do Our best to solve the

problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.4 What Data Do We Collect, and How Do We Collect It?

4.4.1 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).

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

- Direct interactions. You may give Us your name, email address and telephone number by submitting a 'Contact Us' request form, or otherwise by requesting a copy of Our brochure.
- Automated technologies or interactions. As you interact with Our Site, We will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing Our cookies Please see Our Hydrofix Limited Website Cookie Policy (**HYD-POL-021**) for further details.

4.4.3 Depending upon your use of Our Site, We may collect, use, store and transfer some or all of the following personal data (please also see section 4.10 on Our use of Cookies and similar technologies and Our Cookie Policy)

- Name and contact information such as email addresses and telephone numbers
- Web browser type and version, operating system
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to

4.4.4 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For instance, We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. 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.

4.4.5 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade

union membership, information about your health, and genetic and biometric data) on Our Site. Nor do We collect any information about criminal convictions and offences.

4.5 How Do We Use Your Data?

4.5.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 4.6, below.

4.5.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), because it is necessary to comply with a legal obligation, or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

| Purpose/Activity | Type of Data | Lawful Basis for Processing Including Basis of Legitimate Interest |
|---|---|--|
| To enable Us to reply to emails and messages sent by you, or to supply you with Our brochureware (if you have requested Us to do so). | Name, Email Address, and Telephone Number. | Necessary for Our legitimate interests (to respond to requests from Our clients, or other visitors to Our Site). |
| To use data analytics to improve Our website, products/services, marketing, customer relationships and experiences | Technical Data (internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access Our Site). Usage data (information about how you use Our Site). | 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 administer and protect Our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | Name, and Telephone Number. Technical Data (internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access Our Site). | (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. |

- 4.5.3 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message or post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 4.5.4 You have the right to withdraw your consent to Us using your personal data for marketing purposes at any time, and to request that We delete it. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to Us as a result of a request to use Our services, or to otherwise respond to a request from you (such as your request for Us to contact you on a specific matter). We will get your express opt-in consent before We share your personal data with any third party for marketing purposes.
- 4.5.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- For enquiries made via the website, email, telephone or post, We will keep basic contact details (name, address, company name, email address, website, telephone number, details of the enquiry) for the purpose of responding to your enquiry, and your personal data will be deleted once that purpose has been fulfilled.
 - If you are/were a client of ours but decide to use the services of another company in future, We will retain your personal data for a period of six years after Our contract with you ends, for tax purposes.
 - In some circumstances you can ask Us to delete your data: see section 4.3 for further information.
 - 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.
- 4.5.6 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact Our Data Privacy Manager.

4.5.7 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.

4.5.8 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.

4.6 How and Where Do We Store and Secure Your Data?

4.6.1 We only keep your personal data for as long as We need to in order to use it as described above in section 4.5, and/or for as long as We have your permission to keep it.

4.6.2 Your data will only be stored in the UK.

4.6.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site, to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

4.6.4 Steps We take to secure and protect your data include:

- Emails sent to Us directly or via the website are stored in a secure, encrypted Microsoft Office 365 mailbox account within the UK.
- Data stored locally on computers at Our business premises are protected by passwords on those machines as well as antivirus and encryption where applicable.
- 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.

4.7 Do We Share Your Data?

4.7.1 We may share your personal data with the parties set out below for the purposes set out in section 4.5.2:

- **Nifty Solutions Ltd**, the website developers who develop, administrate and run Our Site.
- 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.
- In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

4.7.2 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.

4.7.3 We do not transfer your personal data outside the UK.

4.8 Your Right to Withhold Information

4.8.1 You may restrict Our use of Cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information, see section 4.10 and Our Cookie Policy.

4.9 How Can You Access Your Data?

4.9.1 You have the right to ask for a copy of any of your personal data held by Us (where such data is held). 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 could refuse to comply with your request in these circumstances.

4.9.2 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.

4.9.3 We try to respond to all legitimate requests within one month. Occasionally it could 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.

4.9.4 Please contact Our Data Privacy Manager for more details.

4.10 Our Use of Cookies

4.10.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. In addition, Our Site uses analytics services provided by Google, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. For more details, please refer to Our Cookie Policy.

4.11 Contacting Us

4.11.1 If you have any questions about Our Site or this Privacy Policy, please contact Our Data Privacy Manager at DataPrivacyManager@hydrofix.co.uk . Please ensure that your query is clear,

particularly if it is a request for information about the data We hold about you (as under section 4.9, above).

5 REVISION OF POLICY

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

| Rev. | Date | Purpose of issue / Amendment detail | Prepared by | Approved by |
|------|------------|-------------------------------------|-------------------|-------------------|
| 0 | 01/12/2021 | Issued with redesigned website | Russell Venning | Gustav Pettersson |
| 1 | 14/07/2022 | Update to policy | Gustav Pettersson | Russell Venning |
| | | | | |