

## PRIVACY POLICY

### **Who we are and how to contact us**

Groove Associates Ltd (“Groove”, “we”, “us”) are a data controller for the purposes of the Data Protection Laws (the Data Protection Act 1998, and from 25 May 2018 the General Data Protection Regulation). This means that we are responsible for, and control the processing of, your personal information.

If you have any question regarding our Privacy Policy or any other queries in relation to our status as a data controller in respect of your personal data, please contact us on: [info@groove-ltd.com](mailto:info@groove-ltd.com) or write to us: Charwell House, Wilsom Road, Alton. Hampshire GU34 2PP.

### **Introduction**

Groove is committed to protecting your personal information and we will always be transparent with you about how we are using your details.

The General Data Protection Regulation Act states that organisations must be open about what information they collect, and how they intend to use it. This Privacy Policy explains how we obtain, collect, process and store information about you.

### **What information do we collect and how do we use it?**

In summary, the personal information we collect may be used by us to pursue our legitimate business purposes.

We are specialists in supplying high & medium voltage accessories to the utilities & rail industries. We also provide high performance underwater connectors to the subsea sector and the majority of the personal information relates to individuals in their professional capacity (such as name, business telephone number and business email address), which is provided to us in the course, and in connection with, our services. We may occasionally use external lead generation organisations to provide us with the contact details of people who may be interested in our services. Occasionally, we may come into possession of personal contact details, such as personal email address. In any event, we use such information only in connection with our normal business activities, i.e. providing our services.

We may also use your personal information to contact you to notify you about our services or articles we think may be of interest to you. You can always notify us that you no longer wish to receive such communications by following the “unsubscribe” link in our emails, or by contacting us. If you receive any communications from us which are not connected with our business, please let us know.

We may also collect some personal information when you visit our Site, such as your IP address. When you visit our Site, we recognise only your domain name and not your e-mail address. We will see your e-mail address only if you fill out an Online Contact Form or send us an e-mail message.

If you provide personally identifiable information about yourself such as your name, address, telephone number by completing an Online Contact Form, by filling out a survey, by emailing us or otherwise by voluntarily telling us about yourself or your activities (including handing us your business card, making a connection with one of our partners or staff on LinkedIn etc.), we will collect, retain and use such information in accordance with this Privacy Policy, including to provide the information you have requested.

We do not collect any sensitive personal data.

We may collect information about you that is not personally identifiable, such as the type of Internet browser and operating system you use, or the domain name of the website or the advertisement from which you linked to the Site.

When you view the Site we may store some information on your computer. This information will be in the form of a "Cookie". "Cookies" are small pieces of information that are stored on your browser on your computer's hard drive. Our cookies do not contain any personally identifying information, but they do enable us to tailor the Site to reflect your interests and preferences. Most web browsers automatically accept cookies, but you can usually change your browser to prevent all Cookies or receive a warning before a Cookie is stored.

### **Lawful grounds for the processing of personal data**

Under the Data Protection Laws we need a lawful basis to collect and use your personal data. The law allows for six lawful bases to process people's personal data, and one of them allows personal data to be legally collected and used if it is necessary for a legitimate interest of the organisation – as long as it is fair and balanced and does not unduly impact the rights of individuals.

Our data storage contains mainly data about individuals solely in their business capacity, which is used for the purposes of our normal business activities. Such activities are unlikely to affect the fundamental rights and freedoms of individuals concerned. We have concluded that the most appropriate lawful ground for the processing of your personal information is our legitimate interest in maintaining our business records, and promoting, running and managing our business.

If you are our client, or we are in other contractual relationship with you, we may rely on our right to process your personal information in connection with the performance of such contract.

### **Security and Disclosure**

All information you provide to us is stored on secure servers. The data we collect may be transferred to, and stored at, a destination outside the United Kingdom. It may also be processed by staff operating outside the United Kingdom who work for us or for one of our suppliers. We will take the necessary steps to ensure that your data is treated securely and that any such transfer outside the United Kingdom is in accordance with the Data Protection Laws.

Keeping personal information secure is very important to us and we take appropriate precautions to protect against the loss, misuse and alteration of personal information. However, no data transmission over the internet can be guaranteed to be totally secure. As a result, whilst we strive to protect your personal information, we cannot ensure or warrant the security of any information which is sent via the internet.

We may disclose your personal information to any of our subsidiary or affiliated companies, to our suppliers, agents or representatives or to other users for the purposes associated with our legitimate interests (see above). We may also disclose your personal information to third parties where this is necessary in connection with the services we provide or our legitimate interests. If our services are provided in conjunction with, or by involvement of third parties, such third parties may need to have your personal information in order to fulfil your request.

We do not sell personal information to third parties.

### **Retention periods**

We collect and store personal information for the purpose of maintaining our business records and conducting our business. As such, we will only retain your personal data for as long as we believe it is up-to-date, i.e. as long as we are aware it is associated with a business that is included in our records. If we learn that you are no longer involved with a business that is in our records, we will remove your data from our records, or update it accordingly.

### **Your Rights**

You have a number of rights including:

- right of access to personal data that we process about you, which includes the right to obtain confirmation as to whether or not we process any of your personal data and if this is the case, you have the right to request a copy of your personal data, and the details of our processing of your personal data;
- to require us to correct any inaccuracies in your data;
- to object to our processing of your personal data (including for direct marketing purposes) or to withdraw your consent if you have previously given us your consent;
- to request erasure of your personal data (often referred to as the “right to be forgotten”);

If you wish to exercise any of the above rights, you should put your request in writing or e-mail it to us; we may ask for proof of identity;

We will provide you with a copy of the information that we hold on you free of charge. However, we may charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information.

Groove Associates Ltd will provide any such information without delay and at the latest within one month of receipt.

If you have any concerns or complaints about our privacy activities, you can contact us. You can also contact the Information Commissioner's Office on 0303 123 1113.

### **Changes to this Privacy Policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Last updated May 2018.