

## Introduction

Hy-Ram have a need to process personal data relating to its customers in order to fulfil its normal business practices – the manufacture, sale, repair and hire of tools for the pipeline and related industries.

Hy-Ram will be compliant with and adhere to the GDPR to make sure personal data is protected both electronically and physically.

For the purposes of data protection legislation, the data controller is:

Hy-Ram  
Pelham Street  
Mansfield  
Nottinghamshire  
NG1 82EY

Our nominated data controller (NDC) is Richard Gibbs. If you have any queries, complaints or request please contact our NDC at [rgibbs@hyram.com](mailto:rgibbs@hyram.com) or +44 (0) 1623 422982.

## What we collect and when

Hy-Ram will at various stages throughout your transaction with us collect, store and process the following personal information:

*Name, Company, Phone number, Email address, Business Address, Order/Enquiry History.*

This information is collected in a number of ways: through our website when you fill out the contact us form, over the phone when you call us, from emails you send us and occasionally from forms you fill out or business cards you leave when you visit us at an exhibition. Sometimes we may receive information from a distributor or a manufacturer regarding an enquiry you have made with them.

Linkedin is a business social network and occasionally we may contact members to offer our services, but only where we believe there is a legitimate interest between both parties.

## What we use the information for

Hy-Ram use any information collected to:

- Provide a service and meet our obligations to you – for example contacting you if there are any queries on your order.
- Inform you of other related services - for example emailing you about a new innovative product.
- Make commercial decisions such as pricing.
- Improve our services/products – for example by analysing spend patterns.

## What we do not use the information for

Hy-Ram will not sell information for profit or share it with anyone who might. Information will not be shared with anyone for the purposes of marketing anything other than a specific product we believe there will be a legitimate interest in.

## Other data we collect

Hy-Ram collects statistical data from its website including the country you access the website from, what search engine/term you used where this is provided, the time and date of visit. We do not collect your IP address and none of this data can be linked to a particular individual. We use this information to make business decisions about our website and products, such as gauging the popularity of a particular page

For more information on the statistics we collect from our website please see:

<https://en.support.wordpress.com/stats/>

## Who we share data with

Hy-Ram will share your information with the following outside parties:

- Business critical services – such as a courier service to deliver your order.
- A Hy-Ram nominated distributor or agent for a product you have enquired about.
- Cloud-based electronic services such as Mailchimp.

In all cases the above parties will have been checked by Hy-Ram to ensure they have suitable controls in place to protect personal data.

Hy-Ram may additionally disclose your data to a third party where:

- Obligated to under law
- To enforce or apply terms of use or other agreements
- To protect the rights, property or safety of customers, staff, suppliers and other parties
- Exchanging information with other companies and organisations for the purposes of fraud protection, prevention of money laundering and credit risk reduction

In the process of sharing this information it may be necessary to transfer it outside of the European Economic Area (“EEA”). We will only do so if adequate protection measures are in place in compliance with data protection legislation.

## How long we keep information

Hy-Ram will not retain information indefinitely.

Personal information relating to customers for a maximum of 7 years after their last transaction and/or contact. For individuals who make an enquiry but do not become customers the data will be held for as long as is necessary to ensure effective communication, up to a maximum of 2 years from that individual’s last communication.

In some cases data will be deleted before these deadlines, in line with an individual’s rights under data protection law.

## Your rights

The following section provides a guide to some of the rights granted under the law as they apply to the data we hold. There may be other rights not listed here. More information on all of your rights can be found at:

<https://ico.org.uk/your-data-matters>

All individuals for whom we hold data have a right to receive a copy of the data free of charge. Please see Hy-Ram's Subject Access Request Policy at [www.hyram.com/subjectaccessrequestpolicy.pdf](http://www.hyram.com/subjectaccessrequestpolicy.pdf)

If you find any data held is inaccurate or incomplete, please contact us using the details at the beginning of this policy and it will be rectified.

You may ask for your information to be deleted under the following circumstances:

- You believe the personal data is no longer necessary for the purpose for which it was collected
- You believe data has been unlawfully processed
- The data needs to be erased to comply with a legal obligation

Pending verification of the above Hy-Ram will, when notified, suspend the processing of your data until a decision is made.

Hy-Ram do not currently carry out automated decision making relating to individuals.

In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here: <https://ico.org.uk/make-a-complaint>

## Cookies

Like the vast majority of websites, Hy-Ram use cookies for a variety of purposes such as remembering preferences you have set, collecting statistics and enabling some basic functions. The cookies set by the website fit the following categories:

- *Strictly Necessary Cookies:* Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- *Analytical/ Performance Cookies:* We use cookies to analyse user activity. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are able to find what they are looking for easily.
- *Functional Cookies:* These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences.
- *Third-party Cookies:* These are set by the provider of an external service our website uses either to show you content (such as youtube videos), enable you to interact (such as 'liking' on Facebook) or to collect statistics as detailed above.

The Hy-Ram website will set cookies from the following providers:

- Wordpress Jetpack – <https://automatic.com/cookies>
- Youtube - <https://policies.google.com/technologies/cookies>
- Twitter - <https://help.twitter.com/en/rules-and-policies/twitter-cookies>
- Facebook - <https://en-gb.facebook.com/policies/cookies/>

Please refer to the links above for more information on the cookies these providers may use.

Cookies can be blocked using your browser's settings. Please refer to the help section of your browser for details on how to do this. If you block all cookies from our site some functionality may be impaired.

## Security

Hy-Ram will keep secure any personal data and control access by using one or more of the following methods as appropriate:

- Internal policy
- Internal IT measures (such as passwords, access rights)
- Preventing external access (firewall, virus-checking, anti-malware)
- Physical security (locks)
- Emergency preparedness (encryption)

## Changes in Business Ownership

Hy-Ram Engineering Co. Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Hy-Ram Engineering Co. Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

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