# Brisant Secure Ltd - Privacy Policy

Brisant Secure Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms and conditions of use [www.ultion-lock.co.uk/terms] and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <u>http://www.brisant-secure.com/</u> or <u>https://www.ultion-lock.co.uk/</u> you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Brisant Secure LTD, a limited company registered in England and Wales, with its registered office at Units 2 and 3 Staincliffe Mill Trade Centre, Halifax Road, Staincliffe, Dewsbury, England, WF13 4AR. Its company number is 07880349.

## Information we collect from you

We will collect and process the following data about you:

- Information you give us. This is information about you that you give us by filling in forms on our site <a href="http://www.brisant-secure.com/">http://www.brisant-secure.com/</a> or <a href="http://www.brisant-secure.com/">https://www.ultion-lock.co.uk/</a> (our sites, or individually our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site and when you report a problem with our site. The information you give us may include your name, address, e-mail address, business address, financial and credit card information and phone number and your personal Keycode (which is engraved on Ultion keys).
- Information we collect about you. With regard to each of your visits to our site we use Google Analytics to analyse the use of our website. Google Analytics generates statistical information about website use by means of cookies and tracking code which collect information such as page views, average time on site, pages per visit and total number of site visits etc. The collection of such information may include the information being transmitted to a Google server in the USA. The Google Analytics privacy policy is available at <a href="http://www.google.com/policies/privacy/">http://www.google.com/policies/privacy/</a>.

# Cookies

Our websites have two different hosting platforms. <u>http://www.brisant-secure.com/</u> is hosted on Easyspace and <u>https://www.ultion-lock.co.uk/</u> is hosted on Hyve (the "Hosting Platforms"). These Hosting Platforms may use cookies to distinguish you from other users of our website. This helps them to provide you with a good experience when you browse our website and also allows them to improve our site. For detailed information on the cookies used by our Hosting Platforms and the purposes of such cookies see the Cookie policies of our Hosting Platforms which can be found at the following locations:

Easyspace: <a href="https://www.easyspace.com/terms-and-conditions/cookies">https://www.easyspace.com/terms-and-conditions/cookies</a>

Hyve: <a href="https://www.hyve.com/information-centre/legal/cookie-policy">https://www.hyve.com/information-centre/legal/cookie-policy</a>

# Uses made of the information

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer we will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, please tick the relevant box situated on the form on which we collect your data (the order form or registration form).
  - to notify you about changes to our service;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.

## • Information we collect about you

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

## Retention of your information

Due to the fact that locks are used within doors for long periods of time, often for decades, we will continue to retain your information unless obligations to our regulators require otherwise or we are required remove such data from our records.

## Disclosure of your information

We willshare your personal information with:

- any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006; and
- selected third parties including:
  - our Hosting Platforms/website developer (currently The Consultancy in Hartlepool) ;
  - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; and
  - analytics and search engine providers that assist us in the improvement and optimisation of our site.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Brisant Secure LTD or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use [www.brisant-secure.co.uk/webuse] or [www.ultion-lock.co.uk/webuse] or terms and conditions of supply [www.brisant-secure.co.uk/terms] or [www.ultion-lock.co.uk/terms] and other agreements; or to protect the rights, property, or safety of Brisant Secure LTD, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Where we store your personal data

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Payment transactions will be made through a third party provider and you will have to comply with the payment providers terms and conditions when making payments on the site.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Your rights

Where processing of your personal data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting us at Brisant Secure LTD of Units 2 and 3 Staincliffe Mill Trade Centre, Halifax Road, Staincliffe, Dewsbury, England, WF13 4AR or emailing us at <u>sales@brisant-secure.com</u>. You have the right:

- to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes;
- to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- to ask us not to process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest;
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed or the data needs to be erased to comply with a legal obligation;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing); and
- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

## The Regulator

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by writing to us at <u>sales@brisant-</u><u>secure.com</u>. If you are not satisfied with the processing of your data you have the right to lodge a complaint with the Information Commissioner's Office (ICO) which is the supervisory authority for data protection in the UK. We request that you first bring any complaint to our attention before contacting the ICO so that we may take appropriate action to resolve the issue.

## Links

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### Access to information

The Act and/or Regulation give you the right to access, rectify or erase information held about you. Your right of access can be exercised in accordance with the Act and/or Regulation. You can make an access request by writing to Brisant Secure LTD of Units 2 and 3 Staincliffe Mill Trade Centre, Halifax Road, Staincliffe, Dewsbury, England, WF13 4AR. Any access request will be processed as required by law. Brisant Secure Ltd will provide you with a copy of any personal data undergoing processing free of charge. For any further copies requested by you, we reserve the right to charge a reasonable fee based on administrative costs.

#### Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Brisant Secure LTD of Units 2 and 3 Staincliffe Mill Trade Centre, Halifax Road, Staincliffe, Dewsbury, England, WF13 4AR or please email <u>sales@brisant-secure.com</u> or telephone our customer service line on 01924 410 200

Last updated: [October 2017]