

Website Privacy Policy

DP003

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www.hatsgroup.com (our website) is provided by *[insert name and description of website operator]* ('we', 'our' or 'us'). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**). [We are also subject to the EU General Data Protection Regulation (**EU GDPR**) in relation to goods and services we offer to individuals.

This version of our privacy policy is primarily written for adults, including parents and guardians of child users. **If you are a child (under 18 years old) you are welcome to read this policy if you find it useful but we recommend use of this website for over 18 year olds only.**

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal data we collect about you
- How your personal data is collected
- How and why we use your personal data
- Marketing
- Who we share your personal data with
- How long your personal data will be kept
- Transferring your personal data out of the UK
- Cookies
- Your rights
- Keeping your personal data secure

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- How to complain
- Changes to this privacy policy
- How to contact us
- Do you need extra help?

What this policy applies to

This privacy policy relates to your use of our website only.

Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through our website. We will collect and use the following personal data about you:

- your name, address and contact information, including email address and telephone number and company details
- information to check and verify your identity, eg date of birth
- your gender, if you choose to give this to us
- location data, if you choose to give this to us
- details of any information, feedback or other matters you give us by phone, email, post or via social media
- information about the services we provide to you

If you do not provide personal data we ask for where it is *indicated to be 'required'*, it may *prevent us from providing services to you*.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

How your personal data is collected

We collect personal data from you:

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- directly, when you enter or send us information, such as when you [*insert, eg register with us, contact us (including via email), send us feedback, purchase products or services via our website, post material to our website and complete customer surveys or participate in competitions via our website*], and
- indirectly, such as your browsing activity while on our website; we will [usually] collect information indirectly using the technologies explain in the section on ‘**Cookies**’ below

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see ‘**How to contact us**’ below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Create and manage your account with us	For our legitimate interests or those of a third party
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract

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What we use your personal data for	Our reasons
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	To comply with our legal and regulatory obligations
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests or those of a third party, ie to protect our business, interests and rights or those of others
Customise our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website	Depending on the circumstances: —your consent as gathered [insert, eg by the separate cookies tool on our website]— see 'Cookies' below —where we are not required to obtain your consent and do not do so, for our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price
Retaining and evaluating information on your recent visits to our website and how you move around different sections of our website for analytics purposes. This helps us to understand how people use our website so that we can make it more intuitive or to check our website is working as intended	Depending on the circumstances: —your consent as gathered [insert, eg by the separate cookies tool on our website]— see 'Cookies' below —where we are not required to obtain your consent and do not do so, for our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price

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What we use your personal data for	Our reasons
[Insert details of any other purposes for which cookies are used on the basis of consent to clarify consent is the basis for that collection]	Your consent as gathered [insert, eg by the separate cookies tool on our website]—see ‘Cookies’ below
Communications with you not related to marketing, including about changes to our terms or policies or changes to the services or other important notices	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price
Protecting the security of systems and data	To comply with our legal and regulatory obligations We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests or those of a third party, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price
Updating and enhancing customer records	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract —to comply with our legal and regulatory obligations

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	—where neither of the above apply, for our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing orders and new products
Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, eg to record and demonstrate evidence of your consents where relevant and [insert]	To comply with our legal and regulatory obligations
Marketing our services to existing and former customers	For our legitimate interests or those of a third party, ie to promote our business to existing and former customers See ‘Marketing’ below for further information
External audits and quality checks, eg for the audit of our accounts	For our legitimate interests or a those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards
To share your personal data with members of our group and third parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests or those of a third party, ie to protect, realise or grow the value in our business and assets

See **‘Who we share your personal data with’** for further information on the steps we will take to protect your personal data where we need to share it with others.

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Marketing

We may use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above ‘**How and why we use your personal data**’). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at m.stevenson@hatsgroup.com

We will always treat your personal data with the utmost respect and never share it with other organisations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see ‘**Your rights**’ below.

Who we share your personal data with

We routinely share personal data with:

- other third parties we use to help us run our business, eg marketing agencies or website hosts and website analytics providers

We or the third parties mentioned above may occasionally also need to share personal data with:

- external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations
- professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations

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If you would like more information about who we share our data with and why, please contact us (see ‘**How to contact us**’ below).

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used.

Different retention periods apply for different types of personal data. Further details on this are available in our Privacy and Data Retention Policies.

Cookies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website.

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	The right to object: —at any time to your personal data being used for direct marketing (including profiling)

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	—in certain other situations to our continued use of your personal data, eg where we use your personal data for our legitimate interests.
Not to be subject to decisions without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by our website.</p>

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see ‘**How to contact us**’ below). You may also find it helpful to refer to the [guidance from the UK’s Information Commissioner](#) on your rights under the UK GDPR.

If you would like to exercise any of those rights, please [complete a request form—available on our website at *[insert link]* or]email, call or write to us—see below: ‘**How to contact us**’. When contacting us please:

- provide enough information to identify yourself [(eg your full name, address and customer or matter reference number)] and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

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How to complain

Please contact us if you have any queries or concerns about our use of your information (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK, and

The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you.

How to contact us

You can contact us and/or our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
Enia Hillman - DPO
44 Weir Road, Wimbledon, SW19 8UG
02086054400
DPO@hatsgroup.com

Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us (see '**How to contact us**' above).

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