

24<sup>th</sup> June 2018

## **Privacy policy**

This statement describes the Personal Data Applied Power Engineering (Ltd (APE) may collect about you from correspondence or other communications which may take place, how we may use this data, and other related information that is important for you to know.

This data privacy statement reflects the value we place on earning and keeping the trust of our customers, business partners, Suppliers and others whose Personal Data we receive.

Below we describe the Personal Data APE may collect about you through a variety of means, how we could possibly use this information and other related information that is important for you to know.

### **What happens if data is not provided to APE**

Your granting of any consent and your provision of any Personal Data hereunder is entirely voluntary and may be withdrawn at any point. It should be noted however that the absence of this information may affect how the company can deal with.

### **What Data do we collect?**

When we collect your personal data, we collect what is relevant, adequate, and not excessive for the purpose it is intended. The type of data may include, contact, communications and payment data, professional and Health and safety qualification and other types of Personal Data relevant to the purpose for which it is collected.

The following are examples of information we may collect or create about you:

- How we may contact you, such as name, title, phone number, mailing address, and e-mail address;
- Commercial Communication data received, such as orders, questions, and feedback;
- Personal data, such as language, age, and gender and qualifications,
- Marketing preferences, such as e-mail subscription and frequency preferences;
- Payment data, such as contact and account data;

- Site data used to facilitate the use of the site, such as login and technical data;
- Other data, such as product use and application data, your location and other geographic data,

APE do not collect Sensitive Personal Data unless allowed by law or with your affirmative consent.

Applied Power Engineering accepts your explicit consent to use this data in the ways described in this Privacy Statement or at the point where you disclosed the data.

### **How do we collect your personal data?**

We may collect, create, and observe Personal Data about you from a variety of sources, e-mails telephone conversations correspondence and company literature supplied.

These are the *ways* that we may collect or create information about you.

- **Direct from yourself.** We may collect Personal Data directly from you through a variety of sources, such as telephone, email, our Online Interfaces or our online advertisements. We may collect Personal Data during the commencement or execution of business relationships, during events or tradeshow, when you request publications, complete surveys, register for online services, submit an application for employment, contact us for further information, utilize website tools.
- **Through Automated Methods.** APE as a company do not collect personal information through automated methods
- **From Third Parties.** We may receive contact information from third parties. When we receive such data, we will notify you about where the Personal Data came from and if it came from publicly accessible sources.

### **How long do we keep your data?**

We will keep your Personal Data for the period necessary to fulfil the purposes described in this Privacy Statement unless a longer retention period is permitted by law.

How long we *retain* your personal data depends on the purpose for which it was obtained and its nature. We will keep your Personal Data for the period necessary to fulfil the purposes described in this Privacy Statement unless a longer retention is required. Some of the reasons that determine how long we keep your data are:

- When you have an active account or relationship with APE

- When we are working to provide you with an offer as a potential customer;
- When we need to comply with a court order, law, or legal process;
- When stored on our backup and disaster recovery systems in accordance with our backup and disaster policies and procedures;
- When we have a legitimate interest in retaining the data, and our interests are not outweighed by your rights and freedoms;
- When legal requirements and professional guidelines require it – such as tax and audit purposes, or information on aspects of health and safety;
- If we have your consent

For more information on where and how long your personal data is stored, please contact us at [info@apeltd.com](mailto:info@apeltd.com)

### **How do we use your data?**

We may use your Personal Data to assist you, improve our services, and fulfill the purpose for which you gave us your Personal Data, such as to carry out a transaction, communicate with you, and run our business operations. Applied Power Engineering relies on several legal bases, such as your consent or legitimate interests, for using your Personal Data depending on the circumstances.

How we use your Personal Data may include:

- Carry out transactions you have requested, such as processing orders, registering purchased products, handling warranty claims, answering customer service requests;
- Communicate with you about your account or our relationship;
- Preparation and submission of offers
- Respond to or process a job application or inquiry;
- Run our business operations and manage our risks, including protecting the rights and property of Applied Power Engineering and others;
- Comply with legal requirements and internal policies, such as audit and security policies; and

All personal data used is non-automated and requires APE personnel to process

### **The use of your data**

We process your personal information based on your consent, our legitimate interests, in order to fulfill our obligations to you under contract, or as required by law.

We may process your Personal Data under the following basis:

- **As Required by Law.** We may also process your Personal Data when we are required or permitted to by law; to comply with government inspection, audits, and other valid requests from government or other public authorities; to respond to legal process such as subpoenas; or as necessary for us to protect our interests or otherwise pursue our legal rights and remedies (for instance, when necessary to prevent or detect fraud, attacks against our network, or other criminal and tortious activities), defend litigation, and manage complaints or claims.
- **Consent.** In some cases, we will only process your Personal Data after you have granted your prior permission. Subject to this Privacy Statement or the consent statement at the point of collection of the consent, these are for example requesting an offer, services, training, or other events; creating user profiles; registering for an event or training. Please note that most likely we do have a different legal basis for processing (e.g. legitimate interest) so that consent is not needed. When our use and sharing is not readily apparent when you provide your Personal Data, we will provide you additional information at the time we collect the Personal Data regarding our purposes and use of the Personal Data.
- **Legitimate Interests.** We will process your Personal Data as necessary for our legitimate interests such as to facilitate communication between us Operate our mutual business by using your email or other contact information to communicate with you; to safeguard our IT infrastructure and intellectual property by logging your IP address for intrusion detection purposes, detect and prevent fraud and other crimes; to check your credit and perform risk assessments; We do not process your Personal Data if your rights and freedoms are outweighed by our processing. Our legitimate interests are balanced against your rights and freedoms
- **To Fulfill Our Obligations to You Under Our Contract.** We process your Data in order to fulfill our obligations to you whether in contract or to provide an offer, we therefore process your Personal Data to provide you with the products and services you may request from us.

### **Do we share your data?**

APE may share your Personal Data with other entities, with your consent, for example professional competencies required in the execution of works

We do not share your Personal Data with third parties except in the following circumstances.

- **With your consent.** We may share your Personal Data when we have your consent.
- **For legal reasons.** We may share your Personal Data with a third party when it is reasonably necessary to comply with law, statute, rule, regulation, or professional standard or legal request.

## **Is your data secure?**

The security of your Personal Data is important to us. APE has put in place operational safeguards to protect the confidentiality, integrity, and availability of your Personal Data.

We protect your Personal Data against unauthorized access, use or disclosure, using security technologies and procedures, such as access controls and limitations and operational control when kept as hard copies i.e. contracts.

The transmission of information via the internet cannot be guaranteed as secure. Although we endeavor to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted by electronic means. Any transmission of Personal Data is at your own risk.

## **Your choices regarding your data**

We strive to provide you with choices regarding the Personal Data you provide to us. We have provided the following mechanisms to provide you with control over your information:

- **Communications from APE** We will only use your Personal Data with your express consent. If you are happy to consent to this use, you can indicate in the relevant place where we collect your data or seek such consent. If you wish to change your choices, you may do so by contacting us at [info@apeltltd.com](mailto:info@apeltltd.com). This opt out does not apply to information provided as a result of a product purchase, warranty registration, or other transactions.

## **Your rights**

- Applicable data protection laws may provide you with certain rights regarding our processing of your Personal information. Specifically, these laws may provide you the right to access and update your Personal Data, restrict our processing of your Personal Data, withdraw your consent to our processing of your Personal Data (when applicable), and the right to have your data erased. You also have the right to lodge a complaint with supervisory authorities if you believe your rights have been violated.

- Your rights, and information on how you may exercise these rights, are described in detail below.
- **Modification removal or restrictions.** You can review, change, update and delete your Personal Data. You can request we restrict our use of it if you contest its accuracy, if the processing of your Personal Data is determined to be unlawful, or if we no longer need your Personal Data for processing, but we have retained it as permitted by law. If you request deletion of your Personal Data, we will only delete your account when we no longer have a lawful basis for processing your Personal Data or after a final determination that your Personal Data was unlawfully processed.
- **Retention.** Where the Personal Data you provide is processed based on your consent, you have the right to request that we provide you a copy of, or access to, all or part of such Personal Data in structured, commonly used, and machine-readable format. You also have the right to request that we transmit this Personal Data to another controller, when technically feasible.
- **Withdrawal of Consent.** To the extent that our processing of your Personal Data is based on your consent, you may withdraw your consent at any time.
- Withdrawing your consent will not, however, affect processing based on your consent before its withdrawal, and will not affect continued processing that is based on any other lawful basis for processing your Personal Data.
- **How You Exercise Your Rights.** You may exercise any of the above rights by contacting us at [info@apeltd.com](mailto:info@apeltd.com). We may ask you for additional information to verify your identity. We reserve the right to limit or deny your request if you have failed to provide sufficient information to verify your identity or to satisfy our legal and business requirements.
- **Complaints.** You also have the right to lodge a complaint with the applicable data protection authority in the country you live or work in. However, before doing so, we request that you contact us directly to give us an opportunity to work directly with you to resolve any concerns about your privacy.

## **Where do we process your data?**

All data is only processed within our Rotherham office

## **How do I know this policy is current?**

We may update our privacy statement at any time. When we do, we will publish the current version. If we make material changes to how we treat our user's Personal Data, we will notify you by email and/or through a notice on our Online Interfaces' home page.

We may update this Privacy Statement. When we do, we will post the current version on our website. If we make material changes to how we treat our users' Personal Data, we will notify you by email to the email address specified in your You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Web site and this privacy policy to check for any changes.

## **Contact us**

If you have any questions about this Statement or our use of your Personal Data, please contact us at [info@apeltd.com](mailto:info@apeltd.com) or through our Office No 08456 525454 You may also contact us in writing to the following address:

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