



PRIVACY POLICY

At Halcyon Drives, we want you to be confident that the information you provide when conducting business with us is safe and secure either as a customer, supplier, a user of our website or any other 3rd party.

In this privacy policy we'll tell you how and why we collect your personal info, and your rights and options when it comes to these details. We'll also tell you what steps we take to keep your data secure and confidential.

All personal data stored and processed by us will be in line with the applicable European and UK regulations:

- The General Data Protection Regulation (GDPR) - (EU) 2016/679
- UK Data Protection Act 2018
- The Privacy and Electronic Communications (PECR) - EC Directive Regulations 2003

1. What this Privacy Policy covers

The data controller is Halcyon Drives Ltd whose head office is based in the UK.

This policy applies to all individuals who have contact with us where their personal information would need to be collected, stored and processed in line with our standard commercial needs, as detailed in sections 2 & 3.

We are a business-to-business (B2B) engineering company and our scope does not require us to collect, store and process personally sensitive information.

Our Privacy Policy explains:

- the personal information we collect and why;
- why we process your personal information;
- when and why we will disclose your personal information to other organisations;
- your personal information rights and responsibilities;
- general website use – cookies and site links;
- how we keep your information secure and confidential;
- how long we will hold your information for;
- how to contact us or the data protection regulator;

2. Personal information we collect and why

Commercial purposes

For us to provide/request quotes, process orders, provide support for goods/services and generally manage your account, personal information stored for these purposes is limited to that needed including:

- name;
- job title;
- company email address;
- company related mobile/direct-dial numbers;

Details of your interactions with us regarding quotes, orders or other commercial reasons e.g. copies of emails or notes from conversations held, feedback or complaints.

This information will be stored alongside the general company name, company postal & billing address etc as necessary.



Some individuals may provide other non-work related personal information such as home addresses, alternate phone numbers etc. for work related purposes e.g. they work from home and require information sent direct to them. Information of this kind will only be stored and used as instructed by them. You should always take care when volunteering non-work related personal information.

Credit card details may be required to complete delivery/collection of an order. Credit card details are not stored by Halcyon Drives.

Direct Marketing/E-marketing

Where we have obtained your details lawfully as a prospective customer of our goods and services or you have a current/past customer relationship with us, we may use your personal information to keep you directly updated (by email, telephone or post) about our goods or services, including new products, promotions and events.

Your name and email address you provide to us for commercial purposes may be used to keep you updated about our company or related products/services you have purchased from us via our e-Newsletter. This only applies to known B2B customer contacts, sole traders and some partnership are exempt ([see Section 3 – Why we process your personal information](#)).

Visitors to our Website

Subscription and Contact Us forms etc. are available throughout the website to request/send information or give feedback to Halcyon Drives. The personal data needed from the user will only be that necessary to fulfil the function stated e.g.

- Contact Us will require an individual's name, email address and message as minimum. Other information such as company name, addresses, phone numbers etc. may be needed if dealing with a company related issue and/or when we are required to complete a follow-up action.
- Newsletter Subscribes only require a valid email address, company name and the name of an individual (allowing us to give a more personalised service).

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, see [Section 6 - General use of our website and other third-party sites](#).

Visitors to our company premises

For security purposes, CCTV operates around the company premises. Your image may be recorded in and around our building which may also include your vehicle registration number when using our car park. The CCTV operates on a continuous loop, so all recorded images will be overwritten within 30 days of recording. Copies of CCTV images may be made if required by law or other legal proceedings and shared with the appropriate authorities where necessary.

In the interests of security and as required by our health & safety policies, all our visitors are required to sign-in when entering our company. We will only require an individual's name, arrival & leave times and the person visited. This information is required so:

- we know who is on site for safety reasons i.e. roll call after building evacuation etc.;
- we can be sure who is authorised to be on site;

All visitors will be required to wear a badge number linked to their sign-in details to confirm they are authorised to be on Halcyon Drives premises.



Recruitment

We collect personal information about potential employees, workers, contractors, volunteers and interns through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties such as employers, or background checking agencies.

The following categories:

- Personal contact details such as name, title, address, telephone numbers, and personal email addresses
- Details of your qualifications, skills, experience, employment history and professional memberships
- Information about your current level of remuneration, including benefit entitlements
- Proof of identify, e.g. driving licence or passport
- Right to work documentation, references and other information included in a CV or cover letter or as part of the application process.

We may also collect personal data about you from third parties, however, we will only seek information from third parties once a job offer to you has been made and will inform you that we are doing so.

3. Why we process your personal information

Your personal information is only collected and used (as described in section 2) in accordance with the European GDPR. Our processing of your personal information is based on the following lawful grounds:

Contractual – where your personal data is required to quote or enter into/fulfil a contract for our goods & services or in order for you to provide your goods and services to us.

Consent – an individual has consented to their information been stored and processed to complete the task relevant to the consent given e.g. subscription to our newsletter for non-commercial individuals. Consent to store an individual's information will be overridden where there is a contractual/legal need to do so.

Legitimate Interests – Halcyon Drives use the concept of "legitimate interests" where the processing of an individual's data has a clear benefit to the company and there is a limited privacy impact on the individual.

Our legitimate interest includes:

- Keeping our customer and prospects up-to-date about industry related goods and services, including new products, promotions and events that we think would be of interest. This may include:
 - a) contact from a representative responsible for the ongoing management of a customer's account (by email, telephone or post) based on a past/current contractual relationship with them;
 - b) where we have lawfully obtained personal information of a prospective customer, we will use our legitimate interest to store and process this information for direct marketing purposes (by email, telephone or post).
 - c) delivery of our newsletters, promotions, events or other relevant emails campaigns; non-commercial private individuals, sole traders and some partnerships will still be required to give their explicit opt-in consent as required by 'The Privacy & Electronic Communication Regulations (PECR)'.
- For operational purposes, contact information of individuals representing customers, suppliers and other 3rd party businesses will also be held to ensure efficient delivery of goods, services and other business processes between our companies or other 3rd parties e.g. stores, accounts etc.



- Under our legitimate interest, recruitment data will be processed to:
 - a) confirm a candidate's suitability for employment and decide to whom to offer a job;
 - b) ensure you are eligible for employment;
 - c) take steps at your request prior to entering or to enter into a contract with you;
 - d) respond to and defend against legal claims;
 - e) ensure you do not pose any safety or security risk to either yourself or our staff/organization.
- Performance reporting, continuous improvement and to maintain a positive browsing experience for our visitors when using our website.

An individual may withdraw their permission for us to use their personal information for our legitimate interest at any time by contacting us directly ([see Section 10 – How to contact us](#)) or can simply unsubscribe from any of our e-marketing newsletters they do not wish to receive by clicking on the unsubscribe link at the bottom of each email.

4. When and why personal information is disclosed to other organisations

The personal information we collect from you is confidential.

We work closely with other 3rd party providers and partners (referred in this policy as “data processors”) to support the goods & services we supply. It may be necessary for us to share an individual's details with them to provide a tailored service on our behalf. All data processors acting on our behalf, will have to comply with all applicable European data protection regulations. It is not permitted for a data processor to use your personal information we provide them for their own marketing purposes unless they have direct legitimate basis with you for doing so.

Categories of 3rd party organisations we use, information we provide and their basis for processing an individual's information on our behalf include:

Transport companies to help deliver our products to you e.g. delivery companies, warehouses etc. - name and company contact information (email, phone etc.)

- provided to allow completion of a requested personally named delivery.

Supply partners of goods and services we provide to you – name and company contact information (email, phone etc.)

- provided to allow completion of any required/requested direct deliveries.
- to allow individual contact for other requested support services i.e. sales/technical product support etc.

Newsletter distribution – name, company name and email address

- 3rd party trusted company for the electronic distribution of our personalised newsletter or other email campaigns an individual may be subscribed to. An individual's data is kept secure, not distributed across the email platform and used only to deliver our e-newsletter to the subscribed individual.
- provides us statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter.
- with an easy unsubscribe option, the email address is held as reference to prevent accidental adding to an already unsubscribed campaign.

Your personal information may also be shared:

- if required to do so by law;
- If necessary as part of any legal or potential legal proceedings;



5. Your personal information rights and responsibilities

The General Data Protection Regulation (GDPR) - (EU) 2016/679 describes how organisations, including Halcyon Drives must collect, handle and store personal information. Under this regulation, an individual has certain rights with the regard to the personal information we hold on them.

The right to be informed

Halcyon Drives are transparent about how and why we collect and process an individual's personal information. Details can be found in sections 2,3 & 4 of this privacy policy.

The right of access

Personal information of an individual is stored securely in-house on our CRM database system and, in most cases, is linked directly to the company to which they belong. On written request via email or letter, we can provide free of charge, a copy of the personal information we hold on you and the purpose if its use ([see Section 10 – How to contact us](#)). Halcyon Drives reserves the right to validate any such request before sending personal information to an individual. A small administration fee will be chargeable where a request is deemed to be manifestly unfounded or excessive.

The right to rectification

The personal information we hold on an individual is strictly limited to that needed as detailed in this policy.

Where we have regular contact with individuals (usually on a contractual basis), we can validate and rectify, where necessary, the personal information we hold.

If an individual is aware of data inaccuracies related to them, a request to rectify these details can be made ([see Section 10 – How to contact us](#)).

The right to be forgotten

All individuals in certain circumstances have the right to have their personal data erased from our systems.

When a request is made, we aim to remove the personal information within one month from our active systems.

To protect our data, Halcyon Drives has a long-term backup and archive retention policy in place for data stored electronically. It is not possible to immediately remove an individual's data from the complete backup ([see section 8 - How long do we keep your personal information](#)).

Where the data forms part of a complete or active contract, we are required to keep copies of all documentation that form part of that contract under a commercial, legal or regulatory basis. Under these circumstances the full right to be forgotten would not apply, but where applicable we would restrict any access and future use of your data.

The right to restrict processing

We only store and use an individual's data for the reasons specified in section 2 & 3. Therefore, there is limited scope for the restriction of an individual's data. Your restriction rights may include:

- where you believe your personal information to be incorrect and requires updating before use;
- where we are unable to fully comply with a 'right to be forgotten' request on contractual or legal grounds. This would not preclude us processing your data if needed on a contractual or legal basis;

The right to data portability

As a B2B organisation an individual's data we collect is limited to that needed as specified in section 2 & 3. All other information is company-wide and not directly related to an individual e.g. purchase orders, transactions etc and generally falls outside the scope of data portability.



The right to object

You have the right to object to and restrict certain processing of your data including where we use it for our legitimate interests. This includes:

- no contact request - you have or are dealing with us on a contractual basis, but do not want a company representative to contact you for any other reason than that needed to discuss a contract or potential contract you are involved in. This would not preclude us from contacting other individuals within the same organisation;
- the right to object to our processing of your data for direct marketing/account management purposes. This would not preclude us making contact to discuss a contract you may be involved in or from contacting other individuals within the same organisation;
- the right to object to our processing of your data for e-marketing, which you can exercise by using the "unsubscribe" link in such e-marketing communications;

Your personal data may still be processed if we are contractually or legally obliged to do.

Rights in relation to automated decision making and profiling

Decision making & profiling of an individual is not conducted within our organisation.

6. General use of our website and other third-party sites

Cookies and why we use them

What is a cookie?

A cookie is a small amount of data, often including a unique identifier, sent to the browser and stored on the device connected to a website. To protect your privacy, your browser only permits a website to access the cookies it has already sent to you, and not the cookies sent to you by other websites. Cookies are harmless files which can help improve your experience of using a website because, among other things, they help us to:

- understand your browsing habits;
- respond to you as an individual by tailoring our operations to your needs, likes and dislikes by gathering and remembering information about your preferences;
- monitor which pages you find useful and which you do not;
- understand the number of visitors so that we can analyse data about web traffic which helps us improve our site;

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Many websites do this whenever a user visits them to track online traffic flows. On the Halcyon Drives website, our cookies record information about your online preferences, so we can tailor the site to your interests. You can set your device's preferences to accept all cookies, notify you when a cookie is issued, or not receive cookies at all. Selecting the last option means you will not receive certain personalised features, which may result in you being unable to take full advantage of all the website's features.

Disabling all cookies may mean a website is not able to function correctly.

Each browser is different, so please check the "Help" menu of your browser to learn how to change your cookie preferences. While visiting to our website, every page you see, along with a cookie, is downloaded to your device. Many websites do this because cookies enable website publishers to do useful things like find out whether your device (and probably you) has visited the website before. On a repeat visit this is done by the website's computer checking to see, and finding, the cookie left there on the last visit.



How we use cookies

We only use cookies to help us continuously improve and maintain a positive browsing experience for our visitors when using our website. Here is a list of cookies used on this website:

Required - we use a set of cookies which are critical to the functionality of the site e.g.

- They are used to keep a user logged in and remember previous preferences for our logged in users. These are more seen in support of our own website administrators.
- A cookie is required to remember a visitor has accepted our cookie policy. Without it, a user would be presented with our 'Agree to Accept Cookies' banner on every visit or page refresh.

Cloudflare – used to provide web optimization and security services to improve performance and protect our website. Cloudflare's [privacy policy](#) applies to the data collected (referred to as "End Users").

Google Analytics - used to help us to understand how you make use of our content and work out how we can make things better. These cookies follow your progress through our website, collecting anonymous data on where you have come from, which pages you visit, and how long you spend on the site. This data is then stored by Google to create reports. These cookies do not store your personal data.

The information generated by the cookie about your use of the website, including your IP address, may be transmitted to and stored by Google on servers in the United States. Google may use this information for evaluating your use of the website, compiling reports on website activity for us and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

The Google website contains further information about Analytics and a copy of Google's privacy policy pages...

Social Sharing – We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Facebook, Twitter and Google+, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

How to delete cookies or control them

If you wish to restrict or block cookies set by this or any other website, you can do this through your browser settings. The Help function within your browser should tell you how.

Alternatively, you may wish to visit www.aboutcookies.org which contains comprehensive information on how to do this for a wide variety of browsers. You will also find details on how to clear cookies from your computer as well as more general information about cookies. For information on how to do this on your mobile phone's browser, you will need to refer to your handset manual.

Third party websites

As part of our service, we may provide links from our website or emails to other third-party websites which may have their own privacy policies and terms & conditions. We are not responsible for the privacy policies or practices of third-party websites and we encourage you to read them before continuing to use these sites.



7. How we keep your information secure and confidential

Keeping information about you secure is very important to us.

We store, process and restrict unauthorised access to your personal information in accordance with the high standards required under the European GDPR as detailed in our 'Data Protection' and 'Information Security' policies (copies available on request).

Our primary data servers are located in-house at our offices based in the UK. We have access to cloud storage facilities through Microsoft's O365 with servers located within European Economic Area ("EEA").

From time to time and for operational reasons the personal information we collect from you may be transferred to and stored in countries outside of the European Economic Area ("EEA"). Your information may also be processed by some of our service providers which operate outside the EEA. Different countries have different data protection and security laws and some of these do not offer the same level of protection as you enjoy under European GDPR. However, when we appoint our service providers to help us provide products and services to you (which may include some based in the USA), we take care to ensure that they have appropriate security measures in place to the minimum standards required under the European GDPR.

8. How long do we keep your personal information?

General

We will only retain your personal information for as long as necessary to fulfil the purposes it was collected for.

By law, we must keep a certain amount of information about our customers for a certain period for tax and other regulatory purposes; this may include basic contact information.

To fulfil any future safety or legal obligations, data of individuals involved in design, build and implementation of bespoke projects could be held separately and indefinitely as part of a projects engineering files.

Direct Marketing/Account Management

An individual's information obtained and used for direct marketing/account management will be held for the duration as follows:

Prospect contacts with no previous direct engagement history e.g. through sales visits and/or quotations etc.	Data will be held for up to 7 years, unless asked to be removed.
Prospect contacts with a direct engagement history e.g. through sales visits and/or quotations etc.	Data will be held for as long as an individual and the organization they represent remains valid, unless asked to be removed.
Customer contact data	Data will be held for as long as an individual and the organization they represent is still valid and has a registered customer account with us, unless asked to be removed. Minimum period of 6 years to meet tax and other regulatory purposes required by law.



Business Operations

Contact information of individuals representing customers, suppliers and other 3rd party businesses for operational purposes e.g. stores, accounts, sales etc. will be held for as long as an individual and the organization they represent remains valid, unless asked to be removed.

Recruitment Data

CVs and other data submitted on a speculative basis, at a time when the Company is not recruiting, will normally be deleted or destroyed immediately.

If your application is unsuccessful, the organisation will retain your data on file for six months after the end of the relevant recruitment process. When you are asked and having agreed by giving us consent to hold your details for consideration of future employment opportunities, we may hold your information for up to 12 months. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment, subject to its own new privacy notice.

Revalidate, update or delete

If you have contacted us in the past regarding our products and services, we may get in touch with you to ensure you're still happy to remain on our database and for us to stay in contact with you. We are only able to contact you providing we have not been restricted otherwise ([see section 5 - Your personal information rights and responsibilities](#)).

Where necessary, an individual's details are revalidated as part of the account management process and if required, updated or deleted if requested to do so or the individual is no longer available. Revalidation may be part of an ongoing process when dealing with an individual through direct engagement or indirectly from details provided by the organization the individual represents.

After deletion, an individual's personal information may persist on back-up or archival media for legal, tax or regulatory purposes or until full rotation of our backup cycle.

Backup and archive

To protect our data, Halcyon Drives has a long-term backup and archive retention policy in place for data stored electronically. It is not possible to remove an individual's personal data from a complete backup set. Our normal backup rotation will see all data removed gradually over a period of two years. Processes and protection are in place to ensure that an individual's erased data from our active systems is not generally accessible, restored and made available for use from our backup data.

9. Policy amendments

We may update this privacy policy from time-to-time to keep in line with changes in the current data protection laws or our processes. New versions will be posted on our website and you should occasionally check our privacy policy page to ensure you are happy with any changes. Printable copies of our current privacy policy are available on request.



10. How to contact us or the data protection regulator

If you have any queries relating to our use of your personal information or any other related data protection questions, you can discuss this with your account manager, our customer service team or email our Data Protection representative at privacy@halcyondrives.com or write to:

Data Protection Manager
Halcyon Drives Ltd
Butler Way
Stanningley
Leeds, LS28 6EA
United Kingdom

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the data protection regulator. In the UK, this is the Information Commissioner's Office (ICO).

You can contact them by calling their helpline on 0303 123 1113
Or online at www.ico.org.uk/concerns

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.