

PRIVACY NOTICE – HORIZON INDUSTRIES INTERNATIONAL LIMITED

Introduction

Welcome to Horizon Industries International Limited's privacy notice.

Horizon Industries International Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

If you are accessing this privacy notice electronically, you will be able to click through to the specific areas set out below. Please also use the [Glossary](#) to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

This privacy notice aims to give you information on how Horizon Industries International Limited collects and processes your personal data. This includes personal data that you may provide through <https://www.hiil.co.uk/> (our "website").

We do not knowingly collect data relating to children and our website is not intended to be accessed by children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Horizon Industries International Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any such questions, including any requests to exercise [your legal rights](#), please contact the Data Privacy Manager using the contact details set out below.

Contact details

Full name of legal entity: Horizon Industries International Limited, a private limited company with registered number 09482860

Data Privacy Manager: Nathan Gentzel

E-mail address: gdpr@hiil.co.uk

Postal address: Alpha House, 100 Borough High St, London SE1 1LB

We hope that we can resolve any query or concern you raise about our use of your information. We would appreciate the chance to deal with your concerns in the first instance. However, you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

Changes to the privacy notice and your duty to inform us of changes

This version was last updated in April 2019 and historic versions can be obtained by [contacting us](#).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third party links

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username (where this identifies an individual) or similar identifier.
- **Contact Data** includes billing address, delivery address, e-mail address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data** includes purchases or orders made by you, your interests, preferences and feedback.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Category Personal Data** includes information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, information about your health, including any medical condition, health and sickness records.
- **Criminal Offence Data** includes information about criminal convictions such as details of the commission or alleged commission of any offences, including those revealed in the results of Disclosure and Barring Service ('DBS') checks.
- **Application Data** includes personal information in connection with your application to work with us including:
 - The information you have provided to us in your curriculum vitae and covering letter.
 - The information you have provided through Bamboo HR during the recruitment process, including name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications.
 - Any information you provide to us during an interview.
 - Criminal Offence Data.
 - Special Category Personal Data.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Where you provide us with Special Category Personal Data, we may use such data on an anonymised basis for the purposes of monitoring and producing anonymised reports, including to enable us to be able to conform to equal opportunities obligations.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct Interactions.** You may give us your Identity, Contact and Financial Data by filling in forms through the [“Get in touch with Horizon”](#) section of our website or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - send us a purchase order;
 - provide quotations or proposals for products or services;
 - agree contracts with us (e.g. listing details of key personnel);
 - enquire about a position or apply for a position with us (in which case your application data will be processed by Bamboo HR; their privacy policy is available at www.bamboohr.com/privacy.php);
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, please note that if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.
- **Third parties or publicly available sources.** We may receive Identity and Contact Data about you from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where you enquire about a position with us or apply for a position with us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To set you up as a new client	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include notifying you about changes to our terms or privacy notice	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services,	(a) Technical	Necessary for our legitimate interests (to define types of customers for our products and

marketing, customer and relationships experiences	(b) Usage	services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Administering your application for a job with us and considering your suitability for the relevant role including conducting interviews	(a) Identity (b) Contact (c) Application Data	Necessary for our legitimate interests in administering your application
Obtaining, considering and verifying your employment references and history	(a) Identity (b) Contact (c) Application Data	Necessary for our legitimate interests in administering your application
Reviewing and confirming your right to work, and conducting verification and vetting, including criminal background and credit checks	(a) Identity (b) Contact (c) Financial (d) Application Data	(a) Necessary for our legitimate interests in checking the suitability of staff (b) Necessary to comply with a legal obligation

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by [contacting us](#).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, instructions relating to your project, or any other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the [Glossary](#). We have established data sharing arrangements with our parent company, Horizon Industries Limited to set the parameters of how personal data is exchanged and stored within our company group.
- External Third Parties as set out in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Our website and services use technology from external third parties based outside the European Economic Area (EEA) so the processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Horizon Industries Limited is our US parent company and acts as a joint controller of client information and as a processor for the purposes of using shared facilities and for the general management and administration of the group, including managing GDPR matters and administering HR, payroll and contracts.

External Third Parties

We employ other companies to perform functions on our behalf such as:

- Service providers acting as processors based inside and outside the EEA, including Bamboo HR, CV Online, Egnyte, Jobvite (for historic recruitment and employment purposes), and OneDrive. These services may include fulfilling orders for advertising, providing customer relationship management, marketing assistance and supporting our website and IT functionality. These service providers may be supplied with or have access to your personal data solely for the purpose of providing these services to us on our behalf. Horizon Industries International Limited is the data controller and will remain accountable for your personal data.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based inside the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Horizon Industries International Limited