

HARDWARE TRADE TECHNOLOGY LTD (HTTL)– v1.0JM

PRIVACY POLICY AND TERMS OF USE

Introduction

Welcome to the HARDWARE TRADE TECHNOLOGY 's (the HTTL) privacy notice.

The HTTL 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 when you visit our website (regardless of where you visit it from) tells you about your privacy rights and how the law protects you.

The EU **General Data Protection Regulation (GDPR)** replaces the Data Protection Directive 95/46/EC and was designed to harmonise data privacy laws across the UK and Europe, to protect and empower all UK and EU citizens data privacy and to reshape the way organisations across the region approach data privacy.

This privacy notice is provided in a layered format so you can 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.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

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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 the HTTL collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up as a member and/or to our newsletter, enquire through our website or via

e-mail, purchase a ticket or register a place for our events, engage with our social media channels, take part in a competition or survey and/or engage with the HTTL.

This website is not intended for children and we do not knowingly collect data relating to 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.

Controller

HTTL is the controller and responsible for your personal data (collectively referred to as "HTTL", "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 questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

HARDWARE TRADE TECHNOLOGY :

Any related correspondence should be by way of email or post marked for the attention of "HTTL Data Privacy Manager":

Email address: sales@httl.net

Registered Office: SUITE 1, 27 WAVERLEY GARDENS, EALING, LONDON NW10 7EE

You 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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

This version was last updated on 28 March 2018 and any historic versions can be obtained by contacting us.

PLEASE NOTE: The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of

your requests (for example, a request for the transfer of your personal data) until May 2018 as we are still working towards getting our systems ready for some of these changes.

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

This 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 or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details and other electronic payment mediums.
- **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 this website.
- **Profile Data** includes any relevant username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **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.

We may 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.

We do not collect certain aspects of **Special Categories of Personal Data** about you (this includes details about your sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

It is not necessary for you to subscribe with us in order to access the Website. If you do subscribe, however, it will allow us to personalise our services and offer you some additional benefits. Should you wish to subscribe as a member of HTTL, please visit: <https://www.httl.net>

If you do subscribe, where the password facility is activated, you are responsible for protecting your password and user name and must not share them with or disclose them to anyone else.

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 goods or services). In this case, we may have to cancel a ticket, 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 or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply attend or participate in HTTL seminars, request an invite or information to our events (including, but without limitation, the annual maintenance services), and our other products or services;
 - subscribe on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - purchase tickets for a HTTL event
 - enter a competition, promotion or survey
 - engage with one or more of our social media accounts; or
 - provide us with feedback.
- **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. We may also receive Technical Data about you if you visit other websites employing our cookies.

Please see our cookie policy [\[Cookies¹\]](#) for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU;
 - (b) social media platforms such as LinkedIn, Facebook and Twitter
- Identity and Contact Data from publicly available sources such as Companies House and websites.

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 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.
- Where you have freely provided us with your explicit consent.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all 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 subscribe you as a new member or customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

¹ [Build in link to section headed Cookies below.](#)

	(e) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(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 members, customers and stakeholders use our products/services)
To enable you to partake in a HTTL seminar/ workshop, a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how members, customers and stakeholders use our products/services, to develop them and grow our network)
To administer and protect our network and this 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 network, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how members, customers and stakeholders use our products/services, to develop them, to grow our network and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers, members and stakeholders for our products and services, to keep our website updated and relevant, to develop our network and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (to develop our products/services and grow our network)

	(d) Usage (e) Profile	
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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 opportunities may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or utilised HTTL's goods or services or if you provided us with your details when you entered one of our surveys or participated in any HTTL program or special invitation event where in each case, you have not opted out of receiving our marketing or surveys.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the HTTL and affiliated services for marketing purposes.

Opting out

You can ask us or third-parties to stop sending you marketing messages at any time by contacting HTTL's Data Privacy Manager at sales@httl.net.

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, product/service experience or other transactions.

Cookies

When you visit the Website, we issue a "cookie" to your computer. This is a small program containing a unique code that allows us to identify your computer. The cookie is used to note the different areas of our website service which have recently been accessed through your computer.

Information collected in this way is used to develop and manage our online services by, for example, storing information about your preferences, so as to enable us to customise the Website according to your individual interests. The cookie alone contains no information which can identify you personally. However, when you subscribe as a member on the Website, the cookie will be combined with the personal information that you have provided as part of your registration. If you wish, you are able to set up your computer to refuse to accept cookies. However, if you do so, you may be unable to access certain parts of the Website.

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 [\[Glossary\]](#).
- External Third Parties as set out in the [\[Glossary\]](#).
- Third parties to whom we may choose to sell, transfer, or merge parts of our network or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our network, 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. 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 directors, committee members, 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.

7. Data retention

How long will you use my personal data for?

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, Financial 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.

8. 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 manifestly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. Your statutory rights remain unaffected.

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 in a timely manner. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. Either way in each case, we will notify you and keep you updated.

9. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of the HTTL in conducting and managing our networks to enable us to give you the best service/product and the best and most secure experience. 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

Other groups and agents in the HTTL Group acting as joint controllers or processors and who are based in England and Wales and may provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the EEA who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, academic institutions, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Academic institutions, regulators of, non-government, local and professional organisations who may provide marketing, research, regulatory control, professional standards and professional support and who are based in the United Kingdom.

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.

TERMS OF USE

All material included in our website is intended for information purposes only and does not represent legal advice. Users are hereby placed under notice that they should take appropriate steps to verify such information. No user should act or refrain from acting on the information contained in this website without first verifying the information and as necessary obtaining legal and/or professional advice.

The HARDWARE TRADE TECHNOLOGY makes no representations or warranties whatsoever as to the accuracy of the information contained in this website.

The HARDWARE TRADE TECHNOLOGY expressly disclaims all liability for any direct, indirect or consequential loss or damage occasioned from the use or inability to use this website whether directly or indirectly resulting from inaccuracies, defects, errors, whether typographical or otherwise, omissions, out of date information or otherwise, even if such loss was reasonably foreseeable and the HARDWARE TRADE TECHNOLOGY had been advised of the possibility of the same. Consequential and indirect loss and damage shall include but not be limited to loss of profits, loss of goodwill, and wasted expenditure. The user agrees that material downloaded or otherwise accessed through the use of this website is obtained entirely at the user's own risk and that the user will be entirely responsible for any resulting damage to software or computer systems and/or any resulting loss of data, even if such loss and damage was reasonably foreseeable and the HARDWARE TRADE TECHNOLOGY had been advised of the possibility of the same.

The HARDWARE TRADE TECHNOLOGY does not accept any liability in connection with any third party websites that can be accessed through this website and does not endorse or approve the contents of any such site.

Nothing in these Conditions of Use shall exclude the HARDWARE TRADE TECHNOLOGY's liability for death or personal injury resulting from its negligence.

If any provision of these Conditions of Use or the Notice of Copyright is found to be invalid by any court having competent jurisdiction, the invalidity of that provision shall not affect the validity of the remaining provisions which shall remain in full force and effect.

The HARDWARE TRADE TECHNOLOGY 's omission to exercise any right under these Conditions

of Use or the Notice of Copyright shall not constitute a waiver of any such right unless expressly accepted by the HARDWARE TRADE TECHNOLOGY in writing.

These Conditions of Use and the Notice of Copyright shall be governed by and construed in accordance with the law of England and Wales and the user and the HARDWARE TRADE TECHNOLOGY agree to submit any dispute arising out of the use of this website to the exclusive jurisdiction of the courts of England and Wales.

NOTICE OF COPYRIGHT

Except where expressly stated to the contrary, copyright in the text, graphics and information contained in this website is owned by the HARDWARE TRADE TECHNOLOGY. You may print or download to a personal computer extracts amounting to no more than six pages of this site for personal use providing that (i) the HARDWARE TRADE TECHNOLOGY website(s) is the acknowledged source, and (ii) this permission may be revoked at any time by the HARDWARE TRADE TECHNOLOGY.

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