#### **HEBDEN SOUND LTD PRIVACY NOTICE**

#### What this privacy notices covers

Hebden Sound Ltd is committed to protecting your personal information. In this notice, references to 'we' or 'us' means Hebden Sound Ltd. This notice explains how we collect and use the personal information about you.

#### Who we are

**Hebden Sound Ltd** is a private limited company, its company registration number is 3557219. Hebden Sound Ltd has 2 other trading names, Bridge Microphones, Accusound, both of which are governed by this policy document. When this document refers to Hebden Sound Ltd it is also referring to Bridge Microphones and Accusound in the same manner.

Hebden Sound Ltd operates the website www.hebdensound.co.uk (the "HS Website").

Bridge Microphones operates the website www.bridgemics.co.uk (the "BM Website").

Accusound operates the website www.accusound.com (the "AS Website").

Other domain names are used to point customer/visitors to appropriate pages.

Hebden Sound Ltd is a data controller under the data protection rules and our Data Protection Officer is David Anderson, 172 Wadsley lane, Sheffield, S6 4EE, registration number Z8889862.

#### Information we gather.

Hebden Sound Ltd gathers certain information about you. Information about you is held within Hebden Sound Ltd and is not passed to any other entities.

We collect information in the following ways:

## Information you give us.

When you place an order with Hebden Sound Ltd, online, by phone or in person or you register on one of our websites you give us information. This information may include such items as but exclusively, your name, postal address, email address, phone number, financial and credit card information.

## Information we get from your use of our Website and services.

Each time you visit our Website, we may automatically collect certain information. This information includes technical information, such as Internet Protocol (IP) addresses used to connect your computer to the internet, your login information, browser type and version, browser plug-in types and versions, operating system and platform and information relating to what pages you have viewed (e.g. using cookies as described further below);

#### Information about you from third parties.

We may work with third parties (sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers,) and we may receive information about you from them.

#### How we may use your information

We rely on the legitimate interest basis to use your personal information in some circumstances. For example, when you register on our website, we have a legitimate organisational interest to use your information to respond to you and give you the benefits of registering, as explained on the Website.

We also rely on obtaining your consent to use your personal information. For example, we will seek your consent to receive marketing via email and post about Hebden Sound Ltd.

We may use your information for a number of purposes including the following:

- 1. Compliance with legal, regulatory and corporate governance obligations and good practice
- 2. To provide you with information about Hebden Sound Ltd or our products that you have agreed to receive.

We use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for individuals with whom we may have a formal relationship. Profiling allows us to evaluate and therefore understand those individuals with whom we may have a formal relationship. We do this because it helps us to make appropriate communications.

When building a profile, we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. We may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you, for example addresses, listed Directorships or typical earnings in a given area.

We will use the information we get from your use of our Website and services to:

- 1. administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 2. improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- 3. allow you to participate in interactive features of our service, when you choose to do so;
- 4. as part of our efforts to keep our Website safe and secure;
- 5. measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- 6. make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them; and
- 7. any other reasonable purposes of Hebden Sound Ltd, acting always in accordance with the data protection law (as amended from time to time).

We will use the information you give us to:

- 1. perform services you have requested such as providing you with information you have asked for;
- 2. provide you with information about other goods and services that we offer that are similar to those about which you have already enquired or purchased;
- 3. where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please email info@hebdensound.co.uk
- 4. notify you about changes to our service, including but not limited to any changes to our services or products;
- 5. ensure that content from our Website is presented in the most effective manner for you and for your computer; and
- 6. any other reasonable purposes of Hebden Sound Ltd, acting always in accordance with the data protection law (as amended from time to time).

#### Marketing

We may contact you for marketing purposes by email or text message if you have agreed to be contacted in this manner. By subscribing to our websites or opting in to email communication from Hebden Sound Ltd, you grant us the right to use the email for both email marketing purposes and advertisement targeting.

We may include information from other organisations in these communications.

It is your choice as to whether you want to receive information about our company or our products. If you do not want us to use your personal information in these ways, please tick the relevant box situated on the form on which we collect your data.

You may opt-out of our marketing emails at any time by clicking the 'unsubscribe' link at the end of our marketing emails.

You can also change any of your contact preferences at any time including telling us that you don't want us to contact you. This may be done by any communication medium, or by email to <a href="mailto:info@hebdensound.co.uk">info@hebdensound.co.uk</a>. Should you have a query regarding this please contact our Data Protection Officer.

We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you.

## **Information Sharing and Disclosure**

We may share your information with the following selected third parties:

1. Analytics and search engine providers that assist us in the improvement and optimisation of Our Site.

We may disclose your personal information to third parties:

- 1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- 2. If Hebden Sound Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about individuals will be one of the transferred assets;
- 3. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply other agreements; or
- 4. to protect the rights, property, or safety of Hebden Sound Ltd or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. No data outside of EEA.

We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place. We enter into contracts with all of our data processors and regularly monitor their activities to ensure they are complying with Hebden Sound Ltd's policies and procedures.

We may disclose your personal information to third parties if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

# Users under 18

If you are under 18 and would like to get involved, please ensure that you have consent from a parent or guardian before giving us your personal information. When we collect data about a child or young person aged under 18 we will make it very clear as to the reasons for collecting this data and how it will be used.

# **Keeping your records**

We keep records only for as long as required to operate the service in accordance with legal requirements and tax and accounting rules.

We may retain non-identifiable data for statistical purposes for longer than 6 years.

## Where we may store your information

The data that we collect from you will be transferred to and stored on Hebden Sound Ltd.'s online systems.

By submitting your personal data, you agree to this transfer, storing or processing.

Hebden Sound Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **Your rights**

You have the right to:

- 1. Have any inaccuracies in your data corrected. If you would like to update the details we hold about you other than online, please contact our Data Protection Officer via telephone, email or by letter.
- 2. Request that we delete your personal data.
- 3. Object to profiling. Profiling is any automated processing of personal data to evaluate any feature of your behaviour preference or location, including online tracking and behavioural advertising.
- 4. Request that we do not process your personal data for marketing purposes.
- 5. You have a right to request a copy of the personal information we hold about you. We require you to prove your identity with two pieces of approved identification. Please address requests to the Data Protection Officer and we will respond within one month, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. This request is free of charge unless the request is manifestly unfounded or excessive.

# Changes to this notice and the way we treat personal information

We may update the terms of this privacy notice at any time, so please do check it from time to time.

We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our Website. By continuing to use our Website you will be deemed to have accepted such changes.

#### **Enquires and Complaints**

The Data Protection Officer is the first point of contact regarding any enquires arising from this Privacy Notice. Where possible, please raise all enquires in writing.

If you are unhappy with our work or something that we have done or failed to do, please inform us in writing. Hebden Sound Ltd will acknowledge receipt of all complaints and will endeavour to investigate the complaint within 15 working days

All complaints should be sent to:

Hebden Sound Ltd 172 Wadsley Lane Sheffield S6 4EE You may also complain directly to the Information Commissioner's Office if you are concerned with how we are handling your personal information using their online form which can be found here: https://ico.org.uk/concerns/handling/.

Published April 2018