

# Privacy policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and customers; in this policy we explain how we will handle your personal data.

## 2. How we use your personal data

- 2.1 In this Section 2 we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

- 2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our hosting provider and website security software. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and protecting our website, users and services.

- 2.3 We may process your account data ("**account data**"). The account data may include your name, address, telephone number and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

- 2.4 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, IP address and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

- 2.5 We may process basic personal information (Name, Email, IP) that you optionally provide to us for the purpose of subscribing to our MailChimp email newsletters ("**notification data**"). The notification data is collected by your completion of the Mailchimp sign-up form and subsequent confirmation email.

This data is stored within our account in order to allow us to create and use distribution lists, send marketing email campaigns, and place online advertisements. Personal data may also be transferred to certain of MailChimp's sub-processors who perform some critical services, such as helping MailChimp prevent abuse and providing support to their customers. You can find out more about MailChimp's Privacy Policy here: <https://mailchimp.com/legal/privacy/>. The legal basis for this processing is consent.

- 2.6 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 2.7 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.8 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.9 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **3. Providing your personal data to others**

- 3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.2 We may disclose your account data to our suppliers insofar as reasonably necessary for the repair or replacement of any faulty goods supplied by us which require the original supplier's input.
- 3.3 Financial transactions relating to our website and services may be /handled by our payment services providers, Paypal. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing

with complaints and queries relating to such payments and refunds. You can find information about Paypal's privacy policies and practices at <https://www.paypal.com/uk/webapps/mpp/ua/legalhub-full>.

- 3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **4. International transfers of your personal data**

- 4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 4.2 Your usage data will be transferred to Wordfence in the United States. Transfers to Wordfence will be protected by appropriate safeguards, namely a specific GDPR-compliant Data Processing Agreement. You can find out more about Wordfence's Privacy Policy here: <https://www.wordfence.com/privacy-policy/>
- 4.3 Your notification data will be transferred to Mailchimp in the United States. Transfers to Mailchimp will be protected by appropriate safeguards, namely the EU/Swiss-U.S. Privacy Shield Framework. To learn more about the Privacy Shield program, please visit [www.privacyshield.gov](http://www.privacyshield.gov). You can find out more about MailChimp's Privacy Policy here: <https://mailchimp.com/legal/privacy/>.
- 4.4 Your personal data may be archived in cloud storage and, as a result, backups may exist within data facilities based in certain countries outside the European Economic Area. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

#### **5. Retaining and deleting personal data**

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will retain your personal data as follows:
- (a) Your transactional data will be retained for a minimum period of 6 years following the end of the tax year within which your order was placed,

and for a maximum period of 7 years. This is in order to comply with legal and regulatory requirements (HRMC, VAT)

- (b) Your notification data will be retained for as long as you continue to subscribe to the relevant newsletter. You may unsubscribe or update your preferences at any time using the links provided in the footer of all Mailchimp email newsletters. You may also request complete deletion from our Mailchimp list at any time by contacting either ourselves, or MailChimp directly.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

- (a) The period of retention of usage, account and correspondence data will be determined based on whether a legitimate business interest in the data remains.

- (b) This will be reviewed periodically, and technological means may be used to purge outdated and/or unused accounts as long as this can be undertaken without destroying other data held within the same batch.

5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Amendments**

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We may notify you of major changes to this policy by email or via site-wide notices.

## **7. Your rights**

7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;

- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your basic user account data and prior transactional data by visiting <https://matttechmodular.co.uk/my-account/> when logged into our website. In order to process your data request, we will require appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.13 You may exercise any of your rights in relation to your personal data by written notice to us.

## **8. Third party websites**

- 8.1 Our website includes hyperlinks to, and details of, third party websites.

8.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **9. Personal data of children**

9.1 Our website and services are targeted at persons over the age of 18.

9.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

## **10. Updating information**

10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **11. Our details**

11.1 This website is owned and operated by Matthew Preston (t/as Mattech Modular)

11.2 Our VAT registration number is: GB224908995 and our EORI Number is: GB224908995000

11.3 You can contact us by writing to our postal address, by email or by telephone. All contact details are available on our website at <https://mattechmodular.co.uk/contact/>

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