

Privacy Notice

We take your privacy very seriously. This privacy notice will inform you as to how we look after your personal data when you visit our website hargrovescycles.co.uk ('our Website') (regardless of where you visit from) and when you correspond with us by telephone, mail or otherwise. It tells you about your privacy rights and how the law protects you. This privacy notice is in a layered format so you can click through to the specific areas set out below.

Important information and who we are

This privacy notice aims to give you information on how Hargroves Cycles Limited collects and processes your personal data through the use of our Website, including any data you may provide through our Website when you create an account on our Website, subscribe to our newsletter, make an online enquiry, place an order on our Website, fill in forms on our Website, participate in discussion boards or other social media functions on our Website (if any), enter a competition, promotion or survey, provide us with feedback or report a problem with our Website and when you correspond with us by telephone, email or otherwise.

Our 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 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.

Who we are

Hargroves Cycles Limited ('we', 'us', 'our') is a 'data controller' for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data. You will find our contact details at the end of this notice (see below: 'How to contact us').

Personal data we collect about you

Personal data is any information relating to an identified or identifiable individual.

We collect, use, store and transfer different kinds of personal data about you, including in very limited circumstances sensitive health personal data. This may include:

- Full name;
- Address;
- Email address;
- Telephone numbers (mobile and landline);
- Job title;
- Business name;

- Name of your employer or the organisation you represent;
- Marital status;
- Date of birth;
- Passport information;
- CCTV footage;
- Information relating to your purchase e.g. order number and price;
- Technical information from when you visit our Website, including 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;
- Information about how you use our Website e.g. information about how you use our Website, products and services, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page;
- Profile information, including any username, purchases or orders made by you and your preferences;
- Your personal interests;
- Marketing and communications information, including your preferences in receiving marketing from us and your communication preferences;

and

- Information that you volunteer to us when you create an account on our Website, subscribe to our newsletter, make an online enquiry, place an order on our Website, fill in forms on our Website, participate in discussion boards or other social media functions on our Website (if any), enter a competition, promotion or survey, provide us with feedback or report a problem with our Website and when you correspond with us by telephone, email or otherwise.

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 the data about how you use our Website 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 policy.

If you do not provide personal data

For individual customers or suppliers, where we need to collect personal data to enter into a contract with you and you fail to provide that data when requested, we may not be able to enter the contract with you. This data may include your name and contact details. For individual customers, if you thereafter do not provide personal data we ask for which may

include e.g. warranty related information, this may delay or prevent us from providing our products or services to you.

How your personal data is collected

Directly from you. You may give us your personal data by creating an account on our Website, subscribing to our newsletter, making an online enquiry, placing an order on our Website, filling in forms on our Website, participating in discussion boards or other social media functions on our Website (if any), entering a competition, promotion or survey, providing us with feedback or reporting a problem with our Website, or by corresponding with us by email, telephone or otherwise. This includes personal data you provide when you complete an online enquiry form.

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 and other similar technologies. Please see our cookie policy [\[Please insert link\]](#) for further details.

Other sources. We may receive personal data about you from various third parties as set out below:

- From an employee or representative of the organisation for whom you work;
- Via our IT systems e.g. automated monitoring of our Website and other technical systems (such as our computer networks and connections), CCTV and access control systems, communications systems and email;
- From manufacturers (when dealing with e.g. warranty claims).

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use your personal data for and our lawful basis for doing so.

What we use your personal data for	Our lawful basis for processing data
For individual customers with whom we have contracts – to provide our products and/or services to you	Necessary for the performance of our contract with you or to take steps at your request before entering into a contract
For prospective individual customers e.g. for corresponding with you about the products and/or services we offer, to provide a price quote and to respond to your queries	Necessary for our legitimate interests or those of a third party e.g. to deal with pre-contractual enquiries or issues
For individuals who work for or represent corporate customers with whom we have contracts e.g. for corresponding with you about the products and/or services we offer, to provide a price quote, to respond to your queries and to provide the organisation you work for or represent with our products and/or services	Necessary for our legitimate interests or those of a third party e.g. to deal with pre-contractual enquiries or issues and provide the organisation you work for or represent with our products and/or services
For individuals who work for or represent prospective corporate customers e.g. for corresponding with you about the products and/or services we offer, to provide a price quote and to respond to your queries	Necessary for our legitimate interests or those of a third party e.g. to deal with pre-contractual enquiries or issues
For individual suppliers with whom we have contracts e.g. for corresponding with you about the products or services you offer, to obtain a price quote and to take steps under the contract with you	Necessary for the performance of our contract with you or to take steps at your request before entering into a contract with you
For individuals who work for or represent corporate suppliers e.g. for corresponding with you about the products or services your organisation offers, to obtain a price quote and to manage the contract with the organisation you work for or represent	Necessary for our legitimate interests or those of a third party e.g. to deal with pre-contractual enquiries or issues and to manage the contract with the organisation you work for or represent
For individuals who work for or represent prospective corporate suppliers e.g. for corresponding with you about the products or services your organisation offers and to obtain a price quote	Necessary for our legitimate interests or those of a third party e.g. to deal with pre-contractual enquiries or issues
To deal with manufacturer warranty issues and safety recalls	Necessary for the performance of our contract with you. Necessary to comply with our legal obligations
To manage our customer loyalty programme	Necessary for our legitimate interests or those of a third party e.g. to provide benefits for our customers
To manage our relationship with you, or the organisation which you work for or represent, which will include (where appropriate) notifying you about changes to our terms of business or privacy notice or dealing with complaints	Necessary to comply with our legal obligations. Necessary for our legitimate interests i.e. to manage our relationship with you or the organisation you work for or represent, and to analyse and improve the products or services we offer
To prevent and detect fraud against you or us	Necessary for our legitimate interests or those of a third party i.e. to minimise fraud that could be damaging for us and for you
To prevent and detect fraud against you or us	Necessary for our legitimate interests or those of a third party i.e. to minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity	To comply with our legal and regulatory obligations
Other processing necessary to comply with legal and regulatory obligations that apply to our business (e.g. under health and safety law and financial regulatory law) or as otherwise permitted or required by law	Necessary to comply with our legal obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	Necessary to comply with our legal obligations
Ensuring our business policies are adhered to e.g. policies covering data security	Necessary to comply with our legal obligations. Necessary for our legitimate interests of those of a third party e.g. to make sure we are following our own internal procedures so we can deliver the best service we are able to at the best price
Operational reasons, such as improving efficiency, training and quality control	Necessary for our legitimate interests or those of a third party e.g. to be as efficient as we can so we can deliver the best service for you or the organisation you work for or represent, at the best price
Ensuring the confidentiality of commercially sensitive information	Necessary to comply with our legal obligations. Necessary for our legitimate interests or those of a third party i.e. to protect commercially valuable information

Preventing unauthorised access and modifications to systems	Necessary to comply with our legal obligations Necessary for our legitimate interests or those of a third party i.e. to prevent and detect criminal activity that could be damaging for us and for you or the organisation you work for or represent
Updating and maintaining customer and supplier records	For individual customers, necessary for the performance of our contract with you or to take steps at your request before entering into a contract. Necessary to comply with our legal obligations. Necessary for our legitimate interests or those of a third party i.e. to make sure we can keep in touch with our customers
Staff management and administration	Necessary for our legitimate interests or those of a third party i.e. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service that we are able to
External audits for the audits of our accounts	Necessary to comply with our legal obligations
To keep you updated of special offers and general information via our newsletter	With your consent
To enforce or apply our Website terms and conditions or any other agreements	Necessary for our legitimate interests or those of a third party i.e. to enforce our legal rights and protect our business
To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Necessary for our legitimate interests e.g. for running our business, provision of administration and IT services, network security and to prevent fraud. Necessary to comply with our legal obligations
To deliver relevant website content to you and measure or understand the effectiveness of the content	Necessary for our legitimate interests e.g. to study how customers use our products and/or services, to develop them, to grow our business and to inform our marketing strategy
To use dat analytics to improve our website, products and/or services, marketing, customer relationships and experiences.	Necessary for our legitimate interests e.g. to define types of customers for our products and/or services, to develop them, to grow our business and to informour marketing strategy
For testimonials on our Website	With your consent
To invite reviews of our products and services	With your consent
For crime prevention and detection purposes (CCTV)	Necessary for our legitimate interests e.g. to ensure the safety of our visitors and staff and the protection of our business
For recording and/or reporting accidents that happen in our shops	Necessary to comply with our legal obligations

How and why we use sensitive health personal data

Generally

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

Consent

Where we rely on consent as a lawful basis to process your personal data, you have the right to withdraw your consent at any time. To do this, please telephone, email or write to us (see below: 'How to contact us').

Marketing communications

We may use your personal data to send you periodic communications by email, post and text [Please delete/add to as appropriate] about our products and/or services [Do you have events that you promote in your newsletter?] that might be of interest to you.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving marketing communications at any time by:

- emailing us at admin@hargrovescycles.co.uk;
- writing to us at
150 Commercial Road,
Totton,
Southampton
SO40 3AA
(for the attention of the Hargroves Cycles data controller);
- calling us on 02380 864832; or
- using the 'unsubscribe' link in our emails.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Third party marketing

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

Cookies

We may obtain information about your general usage of our Website by using a cookie which is stored on your browser or the hard drive of your computer, although we do not use cookies to identify individuals. Usage information helps us to improve our Website and to deliver a better and more personalised service. Some of the cookies we use are essential for our Website to operate.

You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. You can also indicate your preference to our Website to control its use of cookies. However, if you block cookies you may not be able to use all the features of our Website. For further information about our use of cookies, please refer to our cookies policy which you will find on our Website.

Who we share your personal data with

Depending on the circumstances, we may share your personal data with:

- External service providers we use to help run our business e.g. website hosting provider, email service provider, analytics and search engine providers, marketing

service provider, IT providers e.g. of cloud based EPOS system, review platform partner and postal service providers;

- Bicycle manufactures (where necessary for the purpose of warranty issues);
- Professional advisers including lawyers, loss adjusters, insurers, auditors, technical consultants and experts;

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible.

Transferring your personal data outside of the uk

Some of organisations with whom we share your personal data are based outside the UK so their processing of your personal data will involve a transfer outside of the UK.

These transfers are subject to special rules under UK data protection law.

Some countries have been assessed as providing an adequate level of protection for personal data. Other countries are not considered to have sufficient data protection laws. We will, however, ensure the transfer complies with UK data protection law. We will do this by ensuring one of the following (or one of the other grounds set out in UK data protection law) applies:

- your data is transferred to countries that have been deemed to provide an adequate level of protection for personal data;
- the transfer is necessary for the performance of a contract between you and us;
- the transfer is necessary to establish, exercise or defend legal claims;
- there are adequate safeguards in place between us and the organisation receiving it (e.g. by the use of approved contractual terms); or
- you have provided explicit consent to the proposed transfer after being informed of any potential risks.

Please contact us (see below: [‘How to contact us’](#)) if you want further information on the specific mechanism used by us when transferring your personal data outside of the UK.

Your rights in respect of your personal data

Data protection law gives you certain rights, which you can exercise free of charge. Your rights will differ depending on our lawful basis for processing your data:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	In certain situations, the right to require us to delete your personal data
Restriction of processing	In certain situations, the right to require us to restrict processing of your personal data e.g. if you contest the accuracy of the data
Data portability	In certain situations, the right to ask us to transfer any personal data you provided to us to another organisation
To object	The right to object at any time to your personal data being processed for direct marketing and in certain other situations to our continued processing of your personal data e.g. where processing is carried out for the purpose of our legitimate interests

We do not use personal data for automated decision making.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office on individuals' rights under the General Data Protection Regulation. Their site can be found [here](#)

If you would like to exercise any of those rights, please email, write or telephone our data control officer (see below: 'How to contact us') and let us have enough information to identify you e.g. your full name, address and client/matter reference number as well as what right you want to exercise and the personal data to which your request relates.

How long we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including;

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law to comply with our legal obligations.

We will not retain your data for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal data.

Keeping your personal data secure

We have put in place reasonable and appropriate security measures to endeavour to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk.

Our Website may, from time to time, 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 policies. When you leave our Website, we encourage you to read the privacy notice of every website you visit before you submit any personal data to these websites.

We also have procedures in place to deal with any suspected data security breach. [Is this correct?] We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so

How to complain

We hope that we can resolve any query or concern you may raise about our use of your personal data. If you want to complain about how we have used your personal data, please email or write to us (see below: 'How to contact us'). However, if we are not able to resolve your complaint to your satisfaction, you can complain to the Information Commissioner's Office (ICO). Further information about how to make a complaint to the ICO can be found on the ICO website www.ico.org.uk.

You also have the right to lodge a complaint with the supervisory authority in the European Union state where you work, normally live or where any alleged infringement of data protection laws occurred.

Changes to this privacy notice

We may change this privacy notice from time to time and when we do so, we will inform you via our Website. If any changes are likely to have an adverse impact on your rights under data protection law, we will use reasonable endeavours to notify you of the changes in advance in writing or by alternative means.

Changes to your personal data

It is important that the personal data we hold about you is accurate and current.

Please let us know if you change your name, address or any other personal detail (see below: 'How to contact us').

How to contact us

Hargroves Cycles Limited

150 Commercial Road,
Totton,
Southampton
SO40 3AA

Tel:02380 864832

Email:admin@hargrovescycles.co.uk

Do you need extra help?

If you would like this notice in another format (for example large print) please contact us (see above: 'How to contact us').