

PRIVACY POLICY

1 Who we are

- 1.1 This Privacy Policy (“Policy”) applies to the processing of personal information collected from users of our websites (“you”) or that you provide to us, Hexstone Limited.
- 1.2 For the purpose of the General Data Protection Regulation 2016 (“the GDPR”, as may be amended from time to time) Hexstone Limited is a Data Controller. In this Policy references to “we”, “us” or “our” refer to Hexstone Limited.
 - 1.2.1 Our Company is incorporated in the United Kingdom with company number 00436243 and a registered office at Opal Way, Stone Business Park, Stone, Staffordshire, ST15 0SW.
- 1.3 We are committed to protecting and respecting your privacy. The purpose of this Policy to explain how we collect, use and secure personal information collected on our network of websites.

2 Key Definitions

- 2.1 **Personally Identifiable Information (“PII”)** means any information relating to an identified or identifiable natural person, including an individual’s name, contact information, professional title, and employer. For the purposes of the GDPR, an individual’s internet protocol address (“IP address”) may be considered PII.
- 2.2 **Tracking Technologies** means cookies, web beacons, serving tracking technologies or other technology solutions performing similar functions. These technologies may include first party cookies (cookies referencing the domain of the website being visited), third-party cookies (cookies referencing a domain other than the one of the website being visited), local shared objects (commonly referred to as “Flash Cookies”), HTML 5 Cookies and tracking pixels (including transparent or clear gifs).
- 2.3 **User** or **you** mean any individual who views or interacts with the Websites, whether or not they are a Customer or a Potential Customer.

3 What Information do we collect and how is it collected?

3.1 Personally Identifiable Information (PII)

We collect and process PII limited to information necessary to achieve one or more legitimate business purpose as described in this Policy. PII may include:

- Basic information such as your name, address, telephone number or email address
- Information that you provide by filling in forms on any websites in our network (currently: www.ojtrade.co.uk, www.icontrade.co.uk, www.stftrade.co.uk, www.hexstone.co.uk, www.owlett-jaton.com, www.stf-fasteners.co.uk, www.icon-fasteners.co.uk, www.jcpfixings.co.uk, www.rightonfasteners.com, www.redtip.co, www.redtip.me.uk). We may also ask you for information when you report a problem with our sites
- Information you have provided in respect of a job advertisement or your interest in any employment opportunities on our sites or any site linked to our sites
- Records of any correspondence in the event that you contact us
- Details of your visits to our sites and the resources you access

Except where you provide your PII to us in accordance with the above, we will not collect it without first asking you for it.

3.2 Information that we acquire indirectly

- We may collect information about your device including, where available, your IP address, operating system and browser type.
- Analytical, Behavioural, and Log Data. We may gather certain information about your use of our sites, such as information about your visit and interaction with our Content.

3.3 Cookies

Cookies are small text files placed on your computer by us when you visit certain parts of the website. This allows us to identify visitors and to analyse browsing habits on the website. A Cookie contains identifying information and is used to make the link between you and the information you have provided to the website. You may delete Cookies, however you may lose any information that enables you to access the website more quickly and it may prevent you from using the full range of services on the website.

The creation of a Cookie does not give us access to any other information such as your e-mail address.

3.4 Other Information

Our site may from time to time contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

4 How is your Information used?

4.1 We may use the information that we collect about you to:

- Provide you with products, services, publications, and information that you request, access, or which may be of interest to you
- Deliver or display content that matches your business interests and responsibilities

4.2 We may analyse information collected from you indirectly to:

- Help us recognise your computer as a previous visitor and save/remember any preferences that you may have while you were visiting one of our sites
- Help us improve our content and our sites
- To personalise your User experience
- For the purpose of identifying trends, statistics and measurements that could contribute to the enhancement of our services
- Identifying market sensitivities and relative market interest in specific product categories.

5 Why do we collect your Information?

We collect information about you in order to improve our business relationship with you and to offer you opportunities to obtain our products and services relevant to your business interests. Collecting this information helps us tailor our products and services to you and therefore communicate with you more effectively. We are aware that many of our Customers make use of a range of media channels so we may also provide a mechanism through which you can express preferences about how you want us to communicate with you. Finally, collecting your information makes it possible to operate our business more effectively.

6 What is the Legal Basis for the Processing of PII?

- 6.1 We rely upon both consent and legitimate business interests for processing PII. For example, we may process PII with a User's consent when they agree that we may place cookies on their devices, or that we can process information that they enter into a form on one of our sites.
- 6.2 It is in our interest as a business to enhance the services that we provide which may include processing your information to enable us to:
- Respond to User enquiries and to fulfil User requests
 - Send Customers or Potential Customers relevant marketing information and offers
 - Complete transactions
 - Provide customer service
 - Send administrative information
 - Personalise Users' experiences with our sites
 - Do so where we are required to by law
- 6.3 We may also process PII when it is in our or a Users' legitimate interests to do so and when these interests are not overridden by an individual's data protection rights. These legitimate interests include providing services to enable us to provide Users of our sites with more relevant content.

7 Who do we share your Information with?

- 7.1 We may disclose your PII to any company in our group, which means our subsidiaries or our ultimate holding company and its subsidiaries, as defined in Section 1159 of the UK Companies Act 2006 (as amended).
- 7.2 We only share your PII with third parties:
- If we are under a duty to disclose or share your PII in order to comply with any legal obligation
 - When they are hired by us or hired on our behalf, including Google Analytics who we may use to gather statistics on portions of our site. These companies – our suppliers – are contractually bound to use personal information we share with them only to perform the services we have hired them to provide
 - To protect the rights, property or safety of Hexstone Limited, our customers or others

8 Data Retention

- 8.1 We will retain the PII that you provide while you remain a Customer of ours or as needed to provide you with products and services.
- 8.2 We will never retain PII about you for longer than is necessary to fulfil the purpose for which it was originally collected.
- 8.3 We may retain your PII after you have cancelled any contract with us if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, prevent fraud and abuse, or enforce this Policy and our Terms of Use. We may also retain PII for a limited period of time if requested by law enforcement agencies.
- 8.4 If you would like more information about how long we retain your information please email sar@hexstone.co.uk.

9 How do we Store and Secure Your Information?

- 9.1 We take the security of the data that we collect very seriously. We have implemented technical, organisational and administrative measures which are generally accepted to protect the PII in our possession and of the third parties who act on our behalf.
- 9.2 By providing your PII you agree to us storing or processing it. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Policy.
- 9.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your PII, we cannot guarantee the security of your information transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

10 Access to Information, Opting Out and Your Privacy Rights

- 10.1 You have the right to access, rectify, erase, restrict, transfer, or object to the use of your information. If you wish to exercise any of these rights or have questions regarding this policy or how we use your information, please contact us at sar@hexstone.co.uk.
- 10.2 You may change or update the information that we hold about you at any time and as often as necessary. In the first instance, you should submit a request for a copy of your information in our possession by sending an email to sar@hexstone.co.uk. We will respond to all such requests without undue delay, and in accordance with the provisions of the GDPR.
- 10.3 If you do not believe that we have responded to your complaint appropriately or in a timely manner, you may contact our Operations Development Manager or the Information Commissioner's Office.

11 Changes to this Privacy Policy

- 11.1 Hexstone Limited reserve the right to modify or amend this Policy from time to time. We will not reduce your rights under this Policy without your consent. If we change our Policy, we will post those changes on this page in addition to updating the "Last Updated" date at the bottom of this Policy. For these reasons, we encourage you to read this Policy regularly.
- 11.2 Your continued use of the Website or accessing Content posted on the Website shall constitute your acceptance of the modified Policy. If there will be any changes made to the use of your PII in a manner materially different from that stated at the time of collection, we will notify you by posting a notice on our site. If you object to any of the changes, or the overall Policy, please contact us via sar@hexstone.co.uk.