



# PRIVACY NOTICE

## How your personal information is used by HPI Racing Ltd.

This privacy notice lets you know what happens to any personal information that you give to us, or any that we may collect from or about you.

We may update this privacy notice from time to time in order to reflect changes in the law and/or our privacy practices.

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## Our Privacy Promise

We promise:

- To keep your personal information private and safe at all times
- Never to sell your personal information
- To give you ways to review and manage your personal information at any time

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## Personal information we may hold

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, marital status, title, dob and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **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 our website.
- **Profile Data** includes your 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.
- **Personnel Data (staff only)** includes name, address, telephone number, dob, National Insurance No, next of kin and details of health.

We also collect, use and share **Aggregated Data** such as statistical or demographic data.

Aggregated Data may be derived from your personal information but is not considered personal

information 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 information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal information** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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## **The source of your Personal Information**

We use different methods to collect information from and about you including:

- direct interactions with you (via phone, e-mail or letter)
  - when you apply for a business account
  - when you purchase our products
  - when you use our websites
  - if you complete a customer survey
  - if you take part in our competitions or promotions
  - from Credit reference agencies, HMRC, Companies House and other publically available directories (for example Telephone Directory, Social Media, Internet, news articles).
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## **How we use your personal information**

- To update your records.
- To maintain connection with our End Users.
- To maintain our business relationship with Customers and Suppliers.
- To develop new ways to meet our customer's needs.
- To develop and carry out marketing activities.
- To allow us to provide relevant and product specific information to our customers through our website and emails.
- To comply with legal and regulatory obligations and follow guidance and best practices of government and regulatory bodies.
- To respond to complaints and seek to resolve them.
- For employment purposes, i.e. recruitment, staff records, training, payroll, health & safety, staff welfare and benefits.
- To run our business in an efficient and proper manner. This includes managing our accounting, business capability, planning, communications, corporate governance, and audit.
- To carry out checks at Credit Reference and Fraud Prevention Agencies pre-application, at application, and periodically after that.
- To monitor and to keep records of our communications with you and our staff.
- For market research and analysis and developing statistics.
- To provide personalised content to you on our digital customer experience.
- To help to develop new products and to review and improve current products.
- To provide insight and analysis of our customers as part of providing products, helping us improve products, or to assess or improve the operating of our businesses.
- To share information, as needed, with our Distributor network as part of providing and administering our products or operating our business.

- To facilitate the sale of one or more parts of our business.
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## Legal grounds for processing your personal information

1. **With your consent or explicit consent** - offering individual choice and control regarding direct marketing communications, market research, analysis and developing statistics and providing personalised content to you.
  2. **Where it is needed to fulfill contractual obligations** - processing your personal information 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.
  3. **Where it is in our legitimate interests to do so** - in the interest of our business in conducting and managing our business 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 information for our legitimate interests.
  4. **To comply with our legal obligations** - processing your personal information where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
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## Disclosures of your personal information

We may have to share your personal information with the parties set out below for the following purposes.

- Service providers who provide IT and system administration services.
- Professional advisers such as lawyers, 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.
- Credit Reference Agencies (CRAs) who assist us in processing business applications by performing credit and identity checks.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions

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## Sending Personal Information outside of the EEA

We are based in the UK, but under certain circumstances your personal information may need to be transferred outside the European Economic Area. If we have to do so, then we will make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

## Marketing Preferences

We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us using the details in the “Contact Us” section of this document or on our website or by following the instructions in the marketing communication.

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## Cookies

Our website sets several cookies to store information on your computer. This allows us, amongst other things, to see which pages are most visited and the location of our visitors.

We do not store any personally identifiable information in cookies, nor is the information ever provided to third parties apart from our analytics provider. It is only used by HPI Racing Ltd. to improve the content and services we offer to visitors of our website. You can adjust your web browser to prevent cookies being set by our website.

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## How long we keep your personal information

Unless we confirm otherwise to you, we will hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations.
  - For as long as we provide products to you and then for as long as someone could bring a claim against us; and/or
  - Retention periods in line with legal and regulatory requirements or guidance.
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## Your rights under data protection laws

Here is a list of the rights that all individuals have under data protection laws.

- The right to request access to your personal information
- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate
- The right to have your personal information completed if it is incomplete
- The right to object to processing of your personal information (the “right to object”)
- The right to restrict processing of your personal information
- The right to have your personal information erased (the “right to be forgotten”)
- The right to move, copy or transfer your personal information (“data portability”)

If you want to exercise any of your rights listed above then please contact us using the details in the “Contact Us” section of this document or on our website. We will then take all necessary actions to facilitate your wishes, where possible.

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>

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## Changes to your personal information

You should let us know if you think your personal information is incorrect or has changed. Please contact us using the details in the “Contact Us” section of this document or our website. We will then take necessary steps to check its accuracy and correct it.

## **If you choose not to give personal information**

If you choose not to give us personal information, we may be unable to supply you with our product or it may prevent us from meeting our obligations to you.

In cases where personal information is optional, it will be made clear at the point when we obtain the information.

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## **How to withdraw your consent**

You can withdraw your consent at any time. Please contact us using the details in the “Contact Us” section of our website.

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## **Contact Us:**

If you have any questions about this privacy notice, or if you wish to exercise your rights in any way, you can contact us by going to the “Contact Us” section of our website.

Alternatively you can email us at: [info@hpiracing.com](mailto:info@hpiracing.com)

28 June 2019