

# Chunc GDPR - Privacy Statement

Chunc Wheelchairs, Specmat Limited is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

## 1. Key terms

We, us, our	Chunc, Specmat Limited
Data Protection Officer	gdpr@chunc.com
Personal data	Any information relating to an identified or identifiable individual

## 2. Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of dealing with an initial or ongoing enquiry concerning any Chunc products or support enquiries. This personal data is required to enable us to provide our service to you.

Customers or clients under the age of 13 will require consent from a person holding 'parental responsibility' before we can provide any actions or services from Chunc Wheelchairs or Specmat Limited.

Personal data we will collect	Personal data we may collect regarding quotations & support requests
your name	preferred sales terms
address and telephone number	shipping preferences
email address	preferred currency
details of your position in your company	Chunc products ordered
website cookies & website analytics data	Your bank, building society name or IBAN details
medical conditions / sizing details of occupant	VAT exemption details

## 3. How your data is collected

We collect most of this information from you, however we may also collect information:

- via our website, we use cookies & analytics tracking on our website to store your viewing preferences and visits
- via our website contact form
- via enquiries made through sales representatives
- via sales enquires either by phone, email or in person

## 4. How and why we use your personal data

Under data protection law, we can only use your personal data if we have proper reason for doing so e.g. in order to create, process and reply to any requests from yourself concerning any HR Smith products and services.

What we use your personal data for	Our reasons
Generating product quotations	In order to provide you with current pricing for our products & services
Generating invoices	In order to create and deliver invoices for purchased products & services
Quality control	For internal quality control procedures
Auditing	For the use of internal audits
Marketing	For use in promoting our business to existing and former clients
External audits e.g. our regulators	For legitimate interests or those of a third party, i.e. to maintain accreditations so we can demonstrate that we operate at the highest standards
Website analytics	To see how effective our website is performing

## 5. Digital & Promotional Communications including newsletters

We may use your personal data to send updates (by email, text message, telephone or post) about products, services & status updates. We have a legitimate interest in processing your personal data for promotional purposes (see 'How and why we use your personal data'). This means we do not usually need your consent to send you promotional communications including newsletters. However, where consent is needed, we will ask for this consent separately and clearly. We will always treat your personal data with the utmost respect and never sell or share it with other organisations outside of HR Smith group of companies unless required by law.

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

- contacting us by email at [gdpr@chunc.com](mailto:gdpr@chunc.com)
- using unsubscribe links on relevant email marketing

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, or the structure of our business. If we have not received any cancellation communication from you by the end of 27th May 2018 we will take this as an acceptance to continue delivering marketing information to yourselves.

## 6. Who we share your personal data with

We routinely share personal data with:

- external auditors and regulators
- our banks / accountants / legal advisors
- our sales agents and representatives

We only allow our service providers to handle your personal data if we are satisfied they take the appropriate measures to protect your personal data. We may disclose and exchange information with law enforcement agencies should this be required by a valid lawful request concerning an investigation or enquiry.

## 7. Where is your personal data held

Information may be held at our offices and those of our group companies, representatives and agents (see 'who we share your personal data with'). Some of our offices are located outside of the European Economic Area. For more information, including on how we safeguard your personal data when data is shared with our overseas office please see 'Transferring your personal data out of the EEA'.

## 8. How long your personal data will be kept

We will keep your personal data after we have finished advising or supplying any services or products. We will do so for one of these reasons:

- 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

We will not retain your data for longer than necessary for the purposes set out in this policy.

## 9. Transferring your personal data out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA) e.g.:

- with your and our service providers located outside the EEA
- if you are based outside the EEA

These transfers are subject to special rules under European and UK data protection law. These non EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal data will be secure.

## 10. Your rights

You have the following rights, which you can exercise free of charge by submitting written notice to the data protection officer

<b>Access</b>	The right to be provided with a copy of your personal data
<b>Rectification</b>	The right to require us to correct any mistakes in your personal data
<b>To be forgotten</b>	The right to require us to delete your personal data - in certain situations
<b>Restriction of processing</b>	The right to require us to restrict processing of your personal data - in certain circumstances e.g. if you contest the accuracy of the data
<b>Data Portability</b>	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations.
<b>To object</b>	The right to object: - at any time to your personal data being processed for direct marketing (including profiling); - in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
<b>Not to be subject to automated individual decision making</b>	The right not to be subject to a decision based solely on automated processing (including profiling)

if you would like to exercise any of those rights, please:

- email, call or write to our Data Protection Officer - see below 'How to contact us'; and
- let us have enough information to identify you
- let us have proof of your identity and address by means that are acceptable by Chunc
- let us know what right you want to exercise and the information to which your request relates

## 11. Keeping your personal data secure

We have appropriate security measures 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 need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

## 12. How to contact us

Please direct any enquires via [gdpr@chunc.com](mailto:gdpr@chunc.com)