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Privacy notice – definitions and contact details

This is the privacy notice of JP (Automatic Transmissions) Ltd, trading under the same name and also known as JPAT Ltd. The version date is shown above.

- In this document, the use of "we", "our", or "us" all refer to JP (Automatic Transmissions) Ltd.
- We are registered in the United Kingdom, company number 1227224.
- Our registered office address is: Units 4a & 4b Pear Tree Industrial Estate, Bath Road, Upper Langford, BS40 5DJ, UK. Our website address is: www.ipat.co.uk

Introduction

- 1. This notice informs you of our policy regarding all the information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you supply to us. It covers information that could identify you ("personal information") and information that could not. In relationship to GDPR law and this notice the word "process" means to collect, store, transfer, use or otherwise act on information.
- 2. We take seriously the protection of your privacy and confidentiality. We understand that all clients, suppliers, staff, as well as visitors to our website, are entitled to know that their personal data will not be used for any purpose unintended by them and will not fall into the hands of a third party. This does not include trusted third parties who assist us with operating our website, conducting our business, so long as those parties agree to keep the information confidential.
- 3. In the event that you are visiting our website, we regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
- 4. We undertake to retain the confidentiality of all information you provide to us, and hope that you will do the same with information about us.
- 5. Our policy complies with UK law including that required by the EU General Data Protection Regulation (GDPR).
- 6. The law requires us to tell you about your rights and our obligations to you with regards to the processing and control of your personal data. In order to do this we request that you read the information provided at: www.knowyourprivacyrights.org
- 7. Except as explained below, we do not share, or sell, or disclose to a third party, any information collected by the officers of this company or through our website.

The basis upon which we process information about you:

The law requires us to outline under six defined bases how we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data. If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have identified that we can continue to process your information.

1. Information we process because we have a contractual obligation with you

When you buy a product or service from us, or you otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it to: sell products to you, provide you with our services, provide you, by any means, such as: email, telephone call, direct mail or letter, with suggestions and advice on products, services, company news, and events

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent

There are some actions when there is no contractual relationship between us, for example, when you browse our website or ask us to provide you with more information about our business, including work opportunities, and our products and services. In such cases you provide your consent to us to process information that may be personal information.

Wherever possible we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies or by asking you to click that you agree with the use of cookies on our website.

You might also give your consent implicitly, for example, when you send us a message by e-mail to which you would hope to expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may gather it in a general way and use it, for example, to monitoring the performance of a particular web page on our website.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists. You may withdraw your consent at any time by instructing us: ep@jpat.co.uk However, if you do so, you may not be able to use our website or our services further.

3. Information we process because we have a legal obligation

Just like all other companies and individuals, we are subject to the law. We must sometimes process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

Specific uses of information you provide to us:

4. Information provided on the understanding that it will be shared with a third party

Our social media pages allow you to post information with a view to that information being read, copied, downloaded, or used by other people. For example: tagging an image, clicking on an icon next to another visitor's message to convey your liking or disliking, and so on, and sharing a Facebook post or Twitter tweet.

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it. Once your words and information enter the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

5. Complaints regarding content on our website

If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate. If we think your complaint is without any basis, we shall not correspond with you about it.

6. Information relating to your method of payment

Payment information is never taken by us or transferred to us through our website. Bar the website hosting company, no employees or contractors have access to the website.

At the point of payment via E-bay you are transferred to a secure page on the website of PayPal. At the point of payment via Paypal we send you a request to which you respond, again, transferred directly to a secure page on the website of PayPal. When requested by customers we also take some payments via other reputable payment service providers. These reputable third party payment service providers are only used in response to a customer requesting we take payment from them for services and products we have provided.

7. Job application and employment

If you send us information in response to a job application, with your permission we may keep it for up to six years in case we decide to contact you at a later date.

If we employ you we collect information about you and your work from time to time throughout the period of your employment. (For fuller details for staff please see 'A note for staff members about GDPR.) This employment information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before securely destroying it and deleting it.

8. Complaining

We record all the information you have given to us when we receive a complaint. We use that information to resolve your complaint. If your complaint reasonably requires us to contact another relevant person or company, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently and sensitively as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information might be.

Use of information we collect when you visit our website:

9. Cookies

Cookies are text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a more personalised experience, it provides the website owner with statistics about how you use the website so that it can be improved over time and it can speed up web searching.

Some cookies may last for a defined period of time, such as day or two or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. We use cookies to track how you use our website. They are placed by software that operates on our servers, and by software operated by third parties whose services we use. When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we ask you not to use our website but to telephone us instead.

10. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device. We use this collated information to assess the popularity of the webpages on our website and in how well we are doing in providing content to you. This collated information is only acted upon internally and isn't shared with a third party.

Disclosure and sharing of your information:

11. Credit reference

To assist in combating fraud, we sometimes share information with credit reference agencies.

12. Debt collection

In the course of collecting debt we use Moneyclaim Online (MCOL) which is HM Courts & Tribunals Service Internet based service for claimants and defendants. In collecting debt via MCOL we share personal and company name, address, and outstanding debt information.

13. Data is processed outside the European Union

Our websites is hosted in Canada, so accordingly data obtained within the UK or any other country is processed outside the European Union. Our Canadian supplier is accredited to the <u>Information Transparency Initiative</u>, <u>CIRA</u> (Canada's webname registrar), and <u>EURID</u>.

14. Access to your personal information

To obtain a copy of any information that we hold about you, you may send us a request to ep@jpat.co.uk After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for its supply.

15. Verification of your information

When we receive any request to access, edit or delete personal information we will take reasonable steps to verify your identity before granting you access or otherwise taking any action. We do this in order to safeguard your information and identity.

Other matters:

16. Use of site by children

We do not sell products or provide services for purchase by children, nor is our marketing aimed at children and young people. If you are under 18, you may use our website only with consent from a parent or guardian.

17. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us. Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

18. How you can complain

18.1 If you are not happy with our privacy policy, or if have any complaint, then you should tell us by email. Our address is ep@jpat.co.uk

18.2 If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

18.3 If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office, with which we are registered. Our reference is: ZA340163. This can be done at https://ico.org.uk/concerns/

19. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us: to provide you with the products/services you have requested, to comply with other law, including for the period demanded by our tax authorities, to support a claim or defence in court.

20. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.