

# OHD, LLLP PRIVACY AND DATA PROTECTION NOTICE

OHD, LLLP, (OHD) recognizes that privacy is important when communicating with customers, suppliers and other third parties. This notice explains how we collect, store, use and share personal data as governed by the EU General Data Protection Regulation (GDPR). GDPR aims to prevent security breaches and the loss of personal data by any organization that holds or processes data.

This notice is addressed to individuals outside our company with whom we interact.

## Introduction

Under GDPR OHD is the Data Controller.

OHD is the manufacturer of the Quantifit® respirator fit test system. The company also sells other products and instruments related to workplace safety.

## What personal data do we collect?

The type and categories of personal data which we may collect include:

- Personal details: Name, email address
- Contact details: Telephone number, email address, company name, etc.
- Device details: A record of instruments that were purchased through OHD.
- Payment details: Company billing address, bank details, account-holder details, etc.
- Usage details: Registration details, details of website content with which you interact, downloads, page views etc.
- Analytics: Country of origin, IP address, page views, etc.
- Credit card information: Information will be kept only for the point of sale and will then be shredded or redacted on the records that are necessary to maintain.

OHD will ensure that the personal data it collects will be adequate, relevant and not excessive for the purposes required. It will be kept accurate and up-to-date based on information provided, and to the best of our ability thereafter.

## Sensitive personal information

OHD does not knowingly collect sensitive personal information (as defined under GDPR) from customers, suppliers or third parties, and you must not submit such information to us. Sensitive information inadvertently submitted to us will be processed so far as is necessary for the purposes of deleting it.

## Children's data

We do not intend to process personal data from any data subject under the age of 18, and we do not knowingly collect such data. If any such data comes to our attention we will delete it.

## How do we collect your data?

Examples of sources from which we may collect your Personal Data include the following:

- When you provide it to us, e.g. where you contact us via email, telephone, or by any other means. We do not record phone calls.
- In the ordinary course of our relationship with you, e.g. in the course of fulfilling supply of goods and services, whether for a fee or not.
- When you manifestly choose to make the data public by completing contact forms, including information collected via the website.
- From third parties who provide it to us (see below, **“Data received from third parties”**).
- When you visit our site or use any features or resources available on or through our site, your browser will automatically disclose certain information, some of which may constitute personal data (see below, **“Cookies and similar technologies”**).
- We may also create personal data about you, such as records of your interactions using our site and details of your account transactions if relevant.

## Data received from third parties

From time to time we may receive information about you from third parties. These may be media partners, exhibitions, conferences, suppliers and other business partners. It is also possible that third parties with whom we have had no prior contact may provide us with information about you. Generally, this information will be your name and contact details, but may include additional information about you that they provide to us.

In some circumstances we will have a legitimate reason for processing the data even if you have not consented to sharing it, e.g. to fulfill an order process; where you have infringed (or potentially infringed) any of our legal rights; fraud prevention, etc.

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information

## How will we use your data?

We want to give you the best experience when interacting with OHD. The data we hold about you helps us provide you with the best possible service level and ensures that we are able to fulfill any contractual obligations. We will use your data for a number of reasons, including:

- To fulfill your request for information.
- To fulfill any contractual or pre-contractual obligations, for example, the supply of goods and services, whether for a fee or not.
- To fulfill any obligations under our sub-contract with a third party.

- To pay you or request payment for goods and services supplied.
- To ensure that our website, marketing emails or other communications are delivering valid and relevant content.
- Running and managing our business effectively and within the law.
- To prevent fraud or other criminal activity.

## What is our legal basis for processing your data?

In line with the processing conditions set out under GDPR, OHD will process your data under one lawful condition:

- It is necessary for the purpose of our legitimate business interests (except if those interests are overridden by the interests, rights or freedoms of the data subjects which requires protection).

OHD will review all data processing regularly to ensure that our interests are not overridden by those of the data subjects.

In all cases data subjects have a number of rights which can be exercised regarding their data (see below, **“What are your individual rights?”**)

If we share your information (see below, **“Who else receives your information?”**), it is on the basis of this same lawful condition.

## Who else receives your data?

We share your data with a number of third parties in order to supply you with our services. These are our data processors, and we have contractual processing agreements in place with them that are reviewed on a regular basis. Only adequate, relevant and limited information is used for each purpose. Key data processors are:

### Microsoft Corporation

We use Microsoft's Office 365 as a third-party email provider to store emails you send us. <https://products.office.com/en-gb/business/office-365-trust-center-privacy>

### FitzMartin

Our web developer and hosting company is FitzMartin, Inc. Our website automatically logs the IP address you use to access our website. <http://www.fitzmartin.com/>

### HubSpot

HubSpot is the marketing tool that we use with our website to track the efficacy of our marketing efforts, and HubSpot tracks emails and removes those who opt out from our mailing list. <https://hubspot.com>

### Google Inc.

Google collects information including IP addresses and information from cookies through our use of Google Analytics on our website. Google Analytics is used for tracking

the number of visits that our different web pages receive. We use this information for analytical purposes only.

For further information regarding cookies, see below (“Cookies and similar technologies”)  
<https://www.google.com/policies/privacy/partners/>

**Microsoft Dynamics CRM**

We use Dynamics CRM for our customer relationship management and marketing automation.  
<https://privacy.microsoft.com/en-us>

**Other business partners**

Where we have legitimate business interests, the personal data we have collected from you may be transferred to other companies. We impose contractual obligations with these companies to ensure that our legitimate interests are not overridden by your interests, rights or freedoms. Examples of this would include:

- Where you have expressed an interest in purchasing goods and services and you are based in a territory where we work alongside a third-party distributor who would be responsible for sales and support in that territory.
- To prevent fraud, cyber-crime, or other criminal activity.
- In connection with the enforcement of our legal rights, e.g. debt collection, copyright or patent infringement, etc.
- If required by law or otherwise needed in connection with legal proceedings.
- Any successor to all or part of our business.

**How long will we keep your data?**

We will retain your personal data only for as long as is necessary in connection with the purposes set out in this notice, unless applicable law requires a longer retention period (i.e. to comply with HMRC requirements or to defend/exercise any legal rights).

If there is no legislative requirement to retain your data, and you are not a customer of OHD or its subsidiaries, we will typically delete your personal data three years after your last contact with us.

**Where is your data stored and how is it secured?**

We take appropriate technical and organizational measures to secure your personal data and to protect it against unauthorized or unlawful use and accidental loss or destruction. These include:

- Secure company servers.
- The use of multi-level password protection.
- Data encryption where appropriate.

- Limiting access to data through appropriate authorization and permission settings.
- A robust IT policy that is reviewed regularly.
- Participation in a regular penetration testing process.
- Secure sockets layer (SSL) technology on our website.

**What are your individual rights?**

Under GDPR and the method of lawful consent which we are using to process your data, you have the following rights:

Your right	Exercising your right
The right to be informed about the collection and use of your data.	This privacy notice informs you about the collection and use of your data. It is available on our website and you may request a written copy of the notice.
You have the right to request access to your personal data	Make a request for access, verbally or in writing.
You have the right to rectification if you believe the personal data we hold is inaccurate	Make a request for rectification, verbally or in writing.
Right to erasure (right to be forgotten) or to restrict processing	Make a request verbally or in writing. In some circumstances, e.g. order fulfilment, immediate erasure will not be possible. In this case you will be informed of the reasons.
Right to object	You have an absolute right to object to your data being used for direct marketing. Our marketing communications utilize easily found ‘opt-out’ buttons for this reason. Alternatively, you may make an objection verbally or in writing.
Rights relating to Automated	We use Data Profiling on our website (See “Cookies and similar technologies”) above.

Decision Making	We only use data profiling as part of our marketing operations – which you may opt out of as explained above - we do not use it for any other automated decision-making process.
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**Transmission of information to us by email**

Transmission of information over the internet may not be entirely secure. If you submit personal data to us in this way you do so entirely at your own risk, and OHD is not responsible for any liabilities, costs or any other form of loss suffered by you as a result of this decision.

**Cookies and similar technologies**

A “cookie” is a data file that is sent from a website you visit to a browser to record information about users for various purposes.

We use cookies and similar technologies on our website, including essential, functional, analytical and targeting cookies and web beacons.

You can reject some or all of the cookies we use on or via our website by changing your browser settings but doing so can impair your ability to use our website or some (or all) of its features. For further information about cookies, including how to change your browser settings, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org), or see our cookies policy.

**Notice updates**

Please note that this privacy notice is reviewed periodically and may be amended from time to time. We will update this notice accordingly with a new effective date stated at the beginning of it.

If we make major changes to our privacy notice or intend to use your data for a new purpose other than the purposes for which we originally collected it, we will notify you by posting a notice on our website.

**Complaints**

We’d like the chance to resolve any complaints you have, but you also have the right to complain to the UK data protection regulator (the ICO) about how we have used your personal data.

Their website is <https://ico.org.uk/for-the-public/raising-concerns>.