

## Privacy Policy

Last updated [5<sup>th</sup> April 2018]

Calrec Audio Ltd (“Calrec”, “we”, “us”, or “our” as the context dictates) is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding personal data and how we will treat it.

This policy (together with our [website terms of use](#) and any other documents referred to in it), applies to your use of:

- the [www.calrec.com](http://www.calrec.com) website (**Website**);
- our social media pages; and
- any of the services accessible through the Website (the **Services**).

By visiting the Website, accessing one of our social media pages and/or using the Services, you are accepting to the practices described in this policy.

The data controller is Calrec Audio Ltd, a company incorporated in England and Wales under company number 02392336, and having its registered office at Nutclough Mill, Hebden Bridge, West Yorkshire, HX7 8EZ.

### 1. What personal data do we collect?

The type of information we collect from you will depend upon the type of interaction you have with us.

Broadly speaking, the types of personal data that we collect may include:

- you are a customer of Calrec: your first and last name, email address, postal address, telephone number and the details of the transactions which you conduct using the Services;
- if you are a job applicant, employee or contractor: your full name, contact details (including address, phone number and email address), identification details, job title, employment history and education details, names and contact details of referees, next of kin details, national insurance number or other information if required by law;
- personal data that you provide by completing forms on the Website, including if you sign up to receive our newsletter or attend one of training events, search for a product, place an order on the Website, request any information, or enter into any competition or promotion;
- if you register or create account with us, your log-in and password details;
- information contained in messages when you post on our social media pages;

- information contained in communications you send to us, for example when you report a problem or to submit queries, concerns or comments regarding the Website or its content; and
- data from surveys that we may, from time to time, run on the Website for research purposes, if you choose to respond to, or participate in, them.

You are under no obligation to provide any such data. However, if you choose to withhold requested information, you may not be able to access all of the Website's contents and services.

Payment processing services are provided by a third party. Any payment card details that you input when placing an order via the Website are received directly by the payment service provider and will be subject to its terms of use and privacy policy. Calrec does not store any of your payment card details on its systems. By inputting payment card details, you are accepting that your payment card details may be used by the payment services provider for the purpose of paying for your order. If you have any questions relating to these services please contact the relevant payment service provider.

## **2. How do we collect personal data?**

We may collect personal data from you in a variety of ways, including the following:

- when you create a Calrec customer account;
- when you place an order via the Website or use the Services;
- when you provide content and other information when you use the Services or post on our social media accounts;
- when you:
  - visit our Website and any other webpage that we own and manage;
  - provide information in your account or manage/change your account information;
  - contact us by phone, email, post or via the Website;
  - subscribe to receive our newsletter or promotional materials or sign up to a mailing list; and/or
  - participate in surveys, or competitions or other promotional activities.

We also collect information automatically when you navigate through the Website. Information collected automatically may include usage details, geo-location data, IP addresses and information collected through cookies, and other tracking technologies (which may not be information which identifies you). For more information on our use of these technologies, see our [Cookie Policy](#).

Calrec may also collect personal data relating to you from third parties. This may include (but is not limited to) the collection of personal data relating to you from:

- our distributors and other partners;

- our customer support service provider, when you make a customer service inquiry;
- someone you duly authorise to act on your behalf; and
- recruiters we have retained and from referees you have provided in support of a job application.

### **3. How do we use personal data?**

We use information we collect relating to you for the purposes of our legitimate interests as follows:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with our newsletters, where you have subscribed to receive our newsletters (please see paragraph 5 below);
- to provide you with information about other products we offer that are similar to those that you have already purchased or enquired about, where you have consented to be contacted for such purposes;
- to ensure that content from this Website is presented in the most effective manner for you and for your computer;
- to administer this Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve this Website to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our Services, when you choose to do so;
- to liaise with distributors and other partners in connection with your use of the Services;
- to deal with enquiries or complaints;
- as part of our efforts to keep this Website safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to conduct our internal business and management processes, for example accounting or auditing purposes; and
- for any other purposes that you would reasonably expect.

We may combine this data with personal data you give to us and personal data we collect that relates to you. We may use this personal data and the combined data for the purposes set out above (depending on the type of data we receive).

We will anonymise personal data relating to you and consolidate such data. We may provide our distributors and other partners with aggregated anonymised data about the users of this Website and the Services, for example behavioural data.

#### **4. How do we share personal data with third parties?**

We may disclose personal data relating to you to third parties in certain circumstances including (but not limited to) the following:

- any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- other third parties that we or any member of our group engage to help us run our business - such as our customer support service provider; payment processors; contractors; couriers; pay roll service providers; debt collection agencies and other parties that assist with debt-recovery functions;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others, where you have consented to this;
- analytics and search engine service providers that assist us in the improvement and optimisation of this Website;
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
- our distributors and other partners;
- our professional advisors, including lawyers, accountants, tax advisors and auditors;
- law enforcement bodies, Courts of law or as otherwise required or authorised by law; and
- regulatory or government bodies for the purposes of resolving complaints or disputes both internally and externally or to comply with any investigation by one of those bodies.

We may also disclose personal data to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we restructure our business, or if integrate our business with another group of companies, in which case personal data held by us will be disclosed to the new owner to be used in the same ways set out in this policy;
- if we are under a duty to disclose or share personal data relating to you in order to comply with any legal obligation, or in order to enforce or apply our [terms and conditions](#) on which we supply products to you or [website terms of use](#) and other agreements; or to protect the rights, property, or safety of us, our customers, or others.

This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;

- for any other purposes that you would reasonably expect.

Before Calrec discloses any personal data to a third party, we take steps to ensure that the third party will protect personal data in accordance with applicable privacy laws and in a manner consistent with this policy. Third parties are required to restrict their use of this information to the purpose for which the information was provided.

## **5. Email Newsletter**

This Website operates an email newsletter program, used to inform subscribers about products and services supplied by this Website. Users can subscribe through an online automated process should they wish to do so but do so at their own discretion. Some subscriptions may be manually processed through prior written agreement with the user.

Subscriptions are managed in compliance with the Privacy and Electronic Communications Regulations 2003. Subscribers are given the opportunity to unsubscribe at any time through an automated system. This process is detailed at the footer of each email campaign. If an automated un-subscribe system is unavailable, clear instructions on how to unsubscribe will be detailed instead.

Email marketing campaigns published by us may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include: the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity.

This information is used to refine future email campaigns and supply the subscriber with more relevant content based around their activity.

## **6. External Links**

Although this Website only looks to include quality, safe and relevant external links users should always adopt a policy of caution before clicking any external web links mentioned throughout this Website.

This Website may, from time to time, contain links to and from the websites of our distributors, partners, partner networks, advertisers 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 data to these websites.

## **7. Social Media Platforms**

Communication, engagement and actions taken through external social media platforms that we participate on are subject to the terms and conditions as well as the privacy policies of those social media platforms.

You are advised to use social media platforms wisely and communicate/participate on them with due care and caution with regard to your personal data. We will never ask for personal or sensitive data through social media platforms and we encourage users wishing to discuss

sensitive details to contact the relevant platform provider through primary communication channels such as by telephone or email.

This Website may use social sharing buttons which help share web content directly from our web pages to the social media platform in question. Where you use such social sharing buttons you do so at your own discretion – you should note that the social media platform may track and save your request to share a web page respectively through your social media platform account. Please note these social media platforms have their own privacy policies, and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these social media platforms.

## **8. Shortened Links in Social Media**

We may through our social media platform accounts share web links to relevant web pages. By default some social media platforms shorten lengthy URLs.

Users are advised to take caution and exercise good judgement before clicking on any shortened URLs published on social media platforms by us. Despite the best efforts to ensure only genuine URLs are published, many social media platforms are prone to spam and hacking and therefore we cannot be held liable for any damages or implications caused by visiting any shortened links.

## **9. Where do we store personal data?**

The personal data that we collect from you may be transferred to, and stored at, locations outside the European Economic Area ("**EEA**"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

As described in this privacy policy, we may also share personal data relating to you with other companies within our group or with third parties who are located overseas for business purposes and operational, support and continuity purposes, for example, when we use IT service providers or data storage services. Countries where personal data relating to you may be stored and / or processed, or where recipients of personal data relating to you may be located may have data protection laws which differ to the data protection laws in your country of residence.

By submitting your personal data, you accept that personal data relating to you may be transferred, stored or processed in this way. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

## **10. How do we protection personal data?**

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect personal data relating to you, we cannot guarantee the security of such data transmitted to the Website; any transmission is at your own risk. Once we have received personal data relating to you, we use strict procedures and security features to try to prevent unauthorised access.

All information you provide to Calrec is stored on secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted industry-standard encryption technologies when transferring or receiving

personal data, such as SSL technology. The safety and security of your information and any personal data relating to you also depends on you. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Website and/or the Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Calrec takes steps to destroy or de-identify personal data when the information is no longer required for any purpose for which it may be used or disclosed by us and we are no longer required by law to retain the information.

## **11. Your rights**

You have the right to access personal data held relating to you. To protect your privacy, we may take steps to verify your identity before taking any action in response to any request. You will not have to pay a fee to access personal information relating to you (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We also want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove any information you think is inaccurate.

Requests in this section should be sent by email or by writing to us using the contact details set out at the end of this policy.

We will only send you marketing material if you consent. We will only send personal data relating to you to a third party for marketing purposes if you consent. When you have consented to marketing material, you have the right at any time to ask us not to process personal data relating to you for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the marketing emails we send to you. You can also exercise the right at any time by sending an email or by writing to us using the contact details set out at the end of this policy.

If you have a concern about the way we are collecting or using your personal information, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

## **12. Changes to this policy**

Calrec reviews and amends its privacy policy from time to time. Any changes we make to this policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this policy. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Website.

## **13. Contacting Us**

If there are any questions regarding this privacy policy, you may contact us using the information below.

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West Yorkshire  
HX7 8EZ

Email: [enquiries@calrec.com](mailto:enquiries@calrec.com)

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