

Information Security Policy Statement incorporating
GDPR Privacy Notice & Privacy Policy
Information Security Management System (ISMS)



Graham Hart (Process Technology) Limited are dedicated and committed to managing its business information security risks and opportunities in a manner which prevents breaches, is transparent and complies with applicable legal and other requirements.

We use the guidance of the International Standard ISO 27001:2013 (non-certified), for the risk assessment of our processes to ensure our training is appropriate to our operations and to continuously improve the effectiveness of our Information Security Management System.

This policy provides a framework for establishing and reviewing our information security objectives. These objectives are implemented through management programmes and focus on:

- achieving zero breaches of information security

The Managing Director has overall responsibility for the implementation of this policy. The Managing Director acts as the company's Information Security Management Representative and Data Protection Officer.

This policy is communicated to all employees, clients, suppliers and other interested parties to ensure that they fully understand how they contribute to the effective implementation of the companies Information Security Management System.

This policy is consistent with our certified Quality, Environmental and Occupational Health & Safety policies and is available to customers, suppliers, subcontractors, visitors and to the general public on request. It will be reviewed annually for continuing suitability during formal management reviews.

Full facilities are afforded to customer's representatives and approving organisations in carrying out any assessment of our Information Security Management System operation.

A handwritten signature in blue ink that reads "Chris Hart".

Chris Hart

Managing Director
Data Protection Officer

Date: 15/01/2025



Name and contact details of our organisation:

Graham Hart (Process Technology) Ltd
Friars Industrial Estate, Idle, BRADFORD, BD108SW, United Kingdom
Telephone: +44(0)1274 617021
Email: dataprotectionofficer@graham-hart.com
Website: www.graham-hart.com

Employees personal data

Please refer to our internal documents “GDPR – Fair Processing Notice (Employee Privacy Notice)” & the “Employee Handbook”.

Purposes of the processing personal data

We use your personal data for:

- maintaining our relationship with our customers or potential customers (LI)
- maintaining our relationship with our suppliers or potential suppliers (LI)
- providing quotations, processing orders and providing agreed services (LI)
- order processing, invoicing, payment processing, and to obtain feedback on our supply / services (CT, LI, PT)
- record keeping, statistical analysis and internal reporting (LI)
- ensuring data security and to provide access to secure areas of our website (LI)
- notifying you about changes to our services or prices (LI)
- monitoring the quality of our services (LI)
- investigation of complaints by interested parties (LI, CT, LO, VI)
- providing evidence in any disputes or anticipated disputes (LI, CT, LO, VI)
- as we may otherwise consider necessary to support the operation of our website. (LI)
- obtaining credit references, credit checks and for debt collection, fraud detection and prevention and risk management purposes (CT, LO, PT)
- protecting the rights, properties and/or safety of our personnel and others (LI, CT, LO, PT, VI,)



Lawful basis for the processing.

The Lawful Basis under which personal data is used processing is identified above using the following key:

CS	Consent	VI	Vital Interest
CT	Contract	PT	Public Task
LO	Legal Obligation	LI	Legitimate Interest

Legitimate interests for the processing.

We use legitimate interests for processing personal data where data is processed in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.

In each situation, we:

- identify a legitimate interest;
- show that the processing is necessary to achieve it; and
- balance it against the individual's interests, rights and freedoms.

As such, the legitimate interests can be our own interests or the interests of third parties. They can include commercial interests, individual interests or broader societal benefits. However, were we can reasonably achieve the same result in another less intrusive way, legitimate interests will not apply.

Records of your legitimate interests assessment (LIA) are held to help demonstrate compliance, if required.

Details of our legitimate interests are identified above under "Purposes of the processing personal data".

Categories of personal data obtained.

We collect a range of personal data relating to you including:

- name
- email address
- telephone number
- delivery and billing address
- IP address
- any other personal information that you may choose to provide to us when you complete online forms or make contact with us.



Recipients or categories of recipients of the personal data

We do not:

- sell your data to third parties.

We do provide person data to:

- our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice
- emergency services in the event that we need to report accidents or incidents or request emergency assistance
- any Government Department, public body or other third party where we believe in good faith that the law requires this, in the interests of public health and safety, or in order to protect the rights, property, or safety of our Company, its employees or others investors and other relevant third parties in the event of an actual or potential sale or other corporate transaction related to KLL
- any third party where industry regulations require us to do so
- any other third parties, if authorised by you to do so.

Details of transfers of the personal data to any third countries or international organisations

We do not transfer personal data outside of the United Kingdom or the European Economic Area. Should this be required we will ensure that it is covered by a separate Contract Clause.

The retention periods for the personal data.

Personal data is retained for no longer than is required for the purpose under which it was collected. After this period, it will be erased. When considering the retention period the following factors will apply:

- Legal requirement to retain for a given period of time
- Statute of limitation under applicable law(s)
- Regulatory requirements relevant to industry requirements
- Disputes or potential disputes
- Guidelines issued by relevant data protection authorities



Rights available to individuals in respect of the processing.

Individuals have the right to obtain a copy of their personal data (if we are processing it) as well as other supplementary information. It helps individuals to understand how and why we use your data, and to check we are doing it lawfully.

Right to withdraw consent

Individuals have the right to have their personal data erased if:

- the personal data is no longer necessary for the purpose which you originally collected or processed it for;
- where consent as the lawful basis for holding the data, and the individual withdraws their consent;
- where legitimate interests as is the basis for processing and the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing;
- where the processing the personal data for direct marketing purposes and the individual objects to that processing;
- where personal data has been processed unlawfully
- where it is necessary to comply with a legal obligation; or
- where personal data has been processed to offer information society services to a child.

Right to lodge a complaint with a supervisory authority.

You have the right to make a complaint to the supervisory authority if you have concerns about our organisation's information rights practice. In the United Kingdom this is the ICO (Information Commissioners Office) and they can be contacted at ico.org.uk

Source of the personal data (if the personal data is not obtained from the individual it relates to).

Not Applicable

Details of whether individuals are under a statutory or contractual obligation to provide the personal data.

Details of whether individuals are under a statutory or contractual obligation to provide the personal data are identified above under "Purposes of the processing personal data".

Details of the existence of automated decision-making, including profiling





We do not process personal data using automated decision-making, including profiling.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why.

Cookies we use

Cookie	Description
BIGipServer<pool_name>	Used to distribute traffic to the website on several servers in order to optimise response times. For more information about these cookies, see the article Overview of BIG-IP persistence cookie encoding on the F5 Support site at https://support.f5.com/csp/article/K6917 This cookie does not store personally identifiable information, and (as "session cookies") is deleted when you close your browser session.
TS01237438	These cookies are set when you move from one page to another page in the site. This cookie does not store personally identifiable information, and (as "session cookies") is deleted when you close your browser session.
_ga _gid _gat	Universal Analytics (Google). These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in a way that does not directly identify anyone, including the number of visitors to the website, where visitors have come to the website from and the pages they visited. Google's overview of privacy and safeguarding can be found at: https://support.google.com/analytics/answer/6004245
cookieconsent_status	This cookie is used to remember that the user has been notified about the use of cookies on www.graham-hart.com . This cookie is not used for any other purpose and expires after one year.

How to turn off cookies



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