

Varley & Gulliver, a Division of Hill & Smith Infrastructure Limited

WEBSITE PRIVACY NOTICE

KEY SUMMARY

If you are just browsing our website, we will not collect any personal information about you.

If you subscribe to any of our mailing lists, we will use your information to send you the information you have requested.

We use cookies which collect information about the usage and performance of our website. The information that the cookies collect is anonymous [other than your IP address]. We use this information to analyse usage of our website by visitors to improve its performance and to inform decisions about content, layout and operation of the website and our services or products.

This notice explains what data we process, why, how it is legal and your rights.



ABOUT US AND THIS NOTICE

This Privacy Notice applies to personal data collected through our website <https://www.varleys.co.uk>

This Privacy Notice is provided by Hill & Smith infrastructure Limited ('we' or 'us'). We are a 'controller' for the purposes of the General Data Protection Regulation (EU) 2016/679 ("**Data Protection Laws**").

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our processing and your rights.

How to contact us

If you have any questions about this Privacy Notice, how we handle your personal data, or want to exercise any of your rights, please contact:

- **GDPR Lead – Francesca Lamb Human Resources Director**
- **Address: Hill & Smith Infrastructure Ltd, Bilston WV14 0QL**
- **Telephone number: 01902 499400**
- **E-mail: gdpr@hill-smith.co.uk**

Changes to the Privacy Notice

We may change this Privacy Notice from time to time. You should check this Privacy Notice occasionally to ensure you are aware of the most recent version that will apply each time you access this website.



WHAT PERSONAL DATA DO WE COLLECT AND WHY?

Personal data provided by you

➤ Visitors only

If you are just browsing our website we will not collect personal data other than your IP address collected through our cookies.

We will collect information about your usage of our website through cookies. Please see our Cookie Policy below. This information is statistical and aggregated and is not processed for the purpose of understanding your particular usage of the website. We collect this information so that we can:

1. tailor and personalise user experience;
2. monitor our website usage to improve its content, layout and performance;
3. improve our services and products;

We also collect personal information when you contact us, send us feedback or complete surveys which we use to improve our services and products in the future.

➤ Marketing / Subscriptions

If you sign up to receive our marketing emails, we will use your name and email address to send you the material you have requested.

You can unsubscribe at any time by contacting us at the details set out above or clicking the "unsubscribe" link in the emails that you receive.

Sensitive personal data provided by you

We do not collect any sensitive personal data about you.

Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on their behalf and has agreed that you can.



HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?

We are allowed to process your personal data on the basis that it is in our legitimate interests to:

- Monitor how our website is used in order to improve it. We use aggregated data to do this so it does not impact on your privacy;
- Respond to enquiries, complaints and requests in order to serve our customers. We will only use your personal data for this purpose. If you are an existing customer, we may add information about the enquiry, complaint or request to other records we hold about you so we can provide a better customer service; and
- Send you materials you have requested, using the data you have provided.

Please be aware that you have the right to object to the processing of your data of any of the legitimate interests identified.



WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

Like any business, we use service providers to operate our website, such as website hosting, and enquiry functionality. Some of these service providers will process your data as part of the services they offer to us. We take steps to ensure that our service providers treat your data in accordance with the law, only use it in accordance, only use it in accordance with our contract with them and keep it secure.

How we keep your data secure

We strive to implement appropriate technical and organisational measures in order to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.

WHEN WILL WE DELETE YOUR DATA?



The table below provides details about how long we will process your data.

Data we process	How long this will be held for
Cookies / Analytics data	Most browsers have built in privacy settings that provide differing levels of cookie acceptance, expiration time, and disposal after a user has visited a particular site.
Information from enquiry forms	Until the enquiry has been completed and no further responses are received for a reasonable period. If you are an existing customer, the enquiry may be added to other information that we hold about you as a customer.
Complaints data	For a period of up to 6 years after resolution of the complaint save where such complaint may lead to a legal claim, in which case this will be held until the expiry of the relevant limitation period. If you are an existing customer, the complaint and its resolution may be added to other information that we hold about you as a customer.
Subscription / marketing requests	Until you tell us that you no longer wish to receive the subscription or marketing material.

YOUR RIGHTS



As a data subject, you have the following legal rights:

- the right of access to personal data relating to you
- the right to correct any mistakes in your information
- the right to ask us to stop contacting you with direct marketing
- the right to prevent your personal data being processed in some circumstances
- The right to object to processing of your data where processed on the grounds of legitimate interests
- the right to erasure in some circumstances

If you would like to exercise your rights, please contact us at the details set out above.

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please note that exceptions apply to some of these rights which we will apply in accordance with the law.

Complaints to the regulator

If you do not think that we have processed your data in accordance with this Privacy Notice, you should let us know as soon as possible. You also have the right to complain to the Information Commissioner's Office. Information about how to do this is available on the ICO's website at www.ico.org.uk.

Cookie Policy

When you visit our website, we use cookies, which are small pieces of information that allow us to maintain your connection to our website. These cookies do not collect or store any personally identifiable information. You can refuse the use of cookies as mentioned below.

Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

How to refuse the use of cookies You may refuse the use of cookies by selecting the appropriate settings in your browser. However, if you do this you may lose some useful functionality such as personalisation and 'keep me signed in' and 'remember me' features.

For further information on the use of cookies please visit: www.allaboutcookies.org