



Industria Bearings and Transmissions Ltd Business Partner Privacy Policy

This policy describes how Industria Bearings and Transmissions Ltd use your personal data in the course of our business, when you use our website, (including business applications), and when we send you marketing communications. Contact details are set out in the “Further information” section below

In this policy personal data means any information that relates to an identifiable natural person – in this case you.

You should read this policy, so you know what personal data we collect about you, what we do with it and how you can exercise your rights in connection with it. You should also read any other privacy policy that we give you, that might apply to our use of your personal data in specific circumstances from time to time. If you have any questions about this policy, please contact info@industria.co.uk.

We use your personal data to sell you our products or provide you with our services (including marketing communications, where you have requested them), manage our business, recruit new staff, comply with our legal obligations, and improve and monitor the performance of our websites.

1. Who is the controller of your personal data?

For the purpose of this policy the controller is:

- Industria Bearings and Transmissions Ltd – with respect to the data collected on the website and other data collected to provide you and/or your organization with its services or sending you marketing communications (the controller is also referred to in this policy as “Industria Bearings and Transmissions Ltd”, “we”, “our”, “us”).

As a controller we make decisions about how and why we use your personal data and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws. We are required by law to give you the information in this policy.

2. What types of personal data do we collect and where do we get it from?

We collect the following categories of personal data:

- Contact information: name and surname, e-mail address, telephone number, name of the company, address of the company;
- Business related information: contact information (see above), details relating to your matter of inquiries, information about other people you share with us, information you provide us when you come into our offices, billing and payment information;



- Industria Bearings and Transmissions Ltd Newsletter: contact information (above);
- Information for the purpose of using EDI requests: e-mail address, name and surname, institution, region, city/town, zip code, telephone number, name of the company, address of the company;
- Browsing information: IP address.

3. What do we do with your personal data, and why?

We process your personal data for a number of different purposes. We must always have a “lawful basis” (i.e. reason, prescribed by law) for processing your personal data. The table below sets out the purposes for which we process different categories of your personal data and the corresponding lawful basis for that processing. For some processing activities, we consider more than one lawful basis to be relevant – depending on the circumstances.

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Industria Bearings and
Transmissions Ltd.

Lawful basis			
Purposes of processing	Your consent	To Perform a contract with you or to take steps at your request prior to entering into a contract	For our legitimate interests
Contract information			
Responding to your requests and answering your questions and communicating with you through communicating tools regarding our products and services		x (If part of a sale of products or service contract or warranty)	x (It's important that we can respond to your enquiries)
Business related information			
Establishing you/your organization as a client on our systems		x	
Providing you/your organization with our products or services, making you an offer, or to fulfil a legal contract between us and you or your company		x	
Maintaining a business relationship with you			x
Taking payment from you in respect of our products or services		x	
Newsletter			
Sending you a newsletter	x		
Browsing information			
Monitoring and producing statistical information regarding the use of our websites, and analysing and improving their functionality			x (We need to perform this limited routine monitoring to make sure our websites work properly)
All categories of information			
Managing, planning and delivering our business and marketing strategies (including client and prospective targeting)			x (We need to use certain client personal data for our business development strategies)
Training our staff			x (Sometimes, it's appropriate for us to use your personal information so that we can provide our staff with training to manage risk and improve the quality of our services)
Continuously reviewing and improving our products and services and developing new ones			x (We have a legitimate interest in making sure that we are continuously improving our offering)
Resolving any complaints from or disputes with you		x	x (We need to be able to try and resolve any complaint or dispute you might raise with us)



Please note that we reserve the right to disclose non-personal statistical information to third parties with whom we have contractual obligations. Examples of non-personal information include domain name, browser type and version, computer operating system and platform, information searched for, pages viewed, time spent on the website and access times.

Unless otherwise provided, we reserve the right to share such information with any company that manages, and/or performs statistical reporting on the website. Any such company will be legally bound to confidentiality.

We will inform you separately in case your personal data is subject to so-called automated decision-making. In such case we will also provide you with information as to the logic used by such systems. You have the right to object to being subject to such decisions, and/or challenge any decisions made wholly on the basis of any automated decision-making system, including providing any additional evidence to assist the individual reviewing the decision.

4. How long is your personal data stored?

Industria Bearings and Transmissions Ltd will normally retain your personal data for 7 years from the end of any contract or event that it relates to, unless we are legally required to retain this information for longer.

5. Who else will have access to your personal data?

Service Providers

Industria Bearings and Transmissions Ltd uses third party service providers, including:

- IT support, data hosting, cloud platform providers who provide technical and support services;
- marketing service providers who send out marketing communications on our behalf;

Where applicable, your personal data will be processed by the service provider on behalf of Industria Bearings and Transmissions Ltd. Industria Bearings and Transmissions Ltd will ensure that any third party that processes your personal data can provide sufficient guarantees regarding the confidentiality and security of your personal data.

Social Networks

Industria Bearings and Transmissions Ltd works closely with selected social media partners (e.g. YouTube, Facebook, LinkedIn, Google). These platforms can be temporarily integrated using plug-ins. If a visitor accesses the website using such a plug-in, the browser creates a direct connection to its servers. In this case the social media partner is given the IP address and other device-related data of a visitor.

Disclosure to third parties

In certain circumstances, Industria Bearings and Transmissions Ltd shares or is obliged to share your personal data with third parties, for the purposes described above and in accordance with applicable data protection laws. These third parties will act as controllers of your personal data in their own right, and they will be responsible for compliance with applicable data protection laws.

These third parties are:



- police, public prosecutors and law enforcement bodies;
- insurers;
- benefits providers;
- external advisors (such as legal advisors, accountants);
- pension trustees;
- courts;
- tax officials.

6. What are your rights and how can you exercise them?

Where Industria Bearings and Transmissions Ltd's processing of your personal data is based solely upon your consent, you have the right to withdraw your consent at any time. If you decide to withdraw your consent Industria Bearings and Transmissions Ltd will stop processing your personal data for that purpose. This will not impact on the legality of any processing undertaken by us prior to the withdrawal of your consent.

Where our processing of your personal data is based on legitimate interests (see table at paragraph 3 above), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Where we are processing your personal data for direct marketing purposes, you have the right to object to that processing.

You have also the right to:

- request access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the persons to whom it is disclosed and the period for which it will be stored;
- require us to correct any inaccuracies in your personal data without undue delay;
- require us to erase your personal data;
- require us to restrict processing of your personal data;
- request that we provide you with a copy of any personal data which you have provided to us, in a machine readable format, where we are processing it on the basis of your consent or because it is necessary for the performance of a contract between you and us (see table at paragraph 3 above) and where the processing is automated; and
- You may request to exercise any of your rights by sending an e-mail to: info@industria.co.uk.

You can also lodge a complaint with a competent data protection supervisory authority: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

7. Use of Google Analytics



This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google") with the extension "_anonymizeIp ()". As a result, IP addresses are processed shortened, a person-relatedness can thus be excluded. We process the data in order to evaluate your use of the website, to compile reports on website activity and to provide other services related to website usage. The legal basis is your consent. In case of a third country-transfer, Google is certified under the EU-US Privacy Shield (please see details under <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

We store your personal data as long as it is necessary for the fulfilment of the above purposes or until you withdraw your consent. Consent can be withdrawn at any time by clicking on the following opt-out link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

8. Further information

In a case you would like to obtain further information about your data protection rights please contact us via our head office in Uxbridge. If you have any concern about privacy issue, please contact us with a thorough description or write to: info@industria.co.uk.

9. Changes to this Business Partner Privacy Policy

This Business Partner Privacy Policy may be changed without prior notice.

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