

PRIVACY POLICY

Howe Tools Limited ("We", "Us", "Howe Tools") are committed to protecting and respecting your privacy.

This policy (together with our [terms of use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our website www.howetools.co.uk (our website) or by corresponding with us by phone, e-mail or otherwise. In these instances Howe Tools is a data controller of the information you provide.
- **Information we collect about you.** With regard to each of your visits to our website we may automatically collect technical information and information about your visit on our server. This information is anonymous and does not contain personal data.
- **Information we receive from other sources.** Howe Tools does not purchase personal data from third parties. We may receive information about you from other companies if we have sold products to you via their website, such as on Ebay or Amazon. In these instances, Howe Tools is a data processor of the information you provide.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- **Information you give to us.**

Information obtained and/ or processed	Purpose, use and recipients of your data	Legal basis for processing
When you complete an order from Howe Tools, we obtain your: <ul style="list-style-type: none">- Name- Billing Address- Delivery Address- Contact Number- Email address- PayPal email address	<ul style="list-style-type: none">• Once you have ordered from us, we have a contractual obligation to arrange for the delivery of your order. We use third party courier companies for this service, so we need to share this information with them so they can deliver your order. If you do not provide this information to us, we will not be able to complete the contractual obligation of delivering the order.• Our couriers may use your phone number and email address to keep you updated with your delivery.• We will use your email address to keep you updated with your order and delivery, and to provide you with your invoice.	Contractual Obligations Legitimate Reasons

	<ul style="list-style-type: none"> • We will store PayPal email addresses to assist with fraud prevention, customer queries and refunds. • Your data and order details will be shared with Google Customer Reviews and Trustpilot. This is so you can provide a review to them about the service you have received from us. We use your reviews to help us ensure our service is of a very high standard. Other people may also use your reviews to help decide on whether to make a purchase from us. If you submit a review to Google Customer Reviews or Trustpilot, your review and name may be displayed on the Internet. Google Customer Reviews and Trustpilot may contact you via email following your purchase from us. • We may occasionally contact you to provide you with important updates about our business, terms and policies. • We may contact you to check the accuracy of your data. 	
<p>We may use the following information if you opt-in to receive marketing communications:</p> <ul style="list-style-type: none"> - Name - Email address - Contact number - Purchase history - Information you provide us through questionnaires within your Howe Tools website user account 	<ul style="list-style-type: none"> • If you opt-in to receive marketing email communications from us, or are a business customer, we may email you about current deals, promotions and voucher codes. • You have the ability to opt-in to receive marketing communication during the order process, or within your Howe Tools website user account. • In your Howe Tools website user account, there is an option to provide additional information to your profile, such as your interests. If you are opted-in to receive marketing communications we may use this information and/ or your purchase history to provide you with more tailored deals, promotions and voucher codes. • In order to distribute email communications to you, we may need to share your data with third party marketing platform providers. • If you want to withdraw your consent for marketing communications you can object by contacting us, by updating your user profile on the Howe Tools website, or through unsubscribing using the link in any email you receive from Howe Tools. • We may contact you to check the accuracy of your data. 	<p>Consent</p> <p>Legitimate Reasons</p>
<p>If you return an item to Howe Tools, we obtain your:</p> <ul style="list-style-type: none"> - Name - Order number - Collection address - Contact number - Email address 	<ul style="list-style-type: none"> • If you decide you do not want an item you have purchased within 30 days of the order, and the item is unused and in its original condition, we will accept a return. This return may be collected by one of our third party courier companies, which will require us to provide them you're your contact and collection details. • In some rare occasions items may be damaged or faulty on delivery. In these instances we will collect the goods from you and supply a replacement or a refund. To do this we 	<p>Contractual Obligations</p> <p>Legitimate Reasons</p>

<ul style="list-style-type: none"> - Return reason 	<p>will provide one of our third party courier companies with your contact and collection details.</p> <ul style="list-style-type: none"> • If your item is faulty after 30 days, and before the expiry of any manufacturer’s warranty, the item will need to be sent back to the manufacturer for repair or replacement. In most instances, you will liaise directly with the manufacturer. Although, for some manufacturers, we may collect the item and return it to the manufacturer for you, or provide your contact details to the manufacturer so that they can contact you about the faulty item. In both cases this may require us to provide them with your personal data. • We may contact you to check the accuracy of your data. 	
<p>If a product is out of stock on our website, you may decide to complete a form on that page to provide us with your;</p> <ul style="list-style-type: none"> - Email address - Phone number 	<ul style="list-style-type: none"> • If you submit the form on our website to provide us with your email address when a product is out of stock, we will send an email to this email address when the product is back in stock. You can unsubscribe from our back in stock email alerts at any time by clicking the unsubscribe link found on the bottom of any back in stock alert email, or by contacting our sales team. • If you submit the form on our website to provide us with your phone number when an item is out of stock, we will use that phone number to call you and discuss alternative products to the one that was out of stock. 	<p>Consent</p>

- **Information we collect about you.** We use the technical information and information about your visit, which is collected by our server, to administer our website and for internal operations; as part of our efforts to keep our website safe and secure and to measure or understand the effectiveness of advertising we serve to you.
- **Information we receive from other sources.** If we have sold products to you via a website other our website, such as Amazon or Ebay, we will have a contractual obligation to deliver those product to you. In these instances, the website where you purchased the product will be the data controller and we will be the data processor. We will receive your personal data and order details from the data controller. We will then process this data to our third party couriers so that they can deliver the product to you, in order to fulfil our contractual obligations. We will not disclose information we receive from other sources to third parties without a lawful basis to do so.

DISCLOSURE OF YOUR INFORMATION

If you have made an order on our website, or if we are collecting a return from you, we will disclose personal data to third party courier companies in order to fulfil our contractual obligations of the delivery or collection.

For legitimate reasons, if you have placed an order on our website, we will also share your data and order details with Google Customer Reviews and Trustpilot. This is so that you have the ability to share your experience of the service you received from us. If you submit a review to them your name and the

review details may be displayed on the Internet. We will use customer reviews to ensure the service we provided is of a very high standard. Other Internet users may also use these reviews to decide on whether to purchase from us.

If you have opted-in to marketing communications, we may share your information with a marketing platform provider so that we can send email communications to you.

Occasionally, we may have a contractual obligation, a legitimate interest, or a legal obligation to disclose your information to one of the following third parties:

- Payment service providers
- External auditors
- HM Revenue & Customs
- Fraud prevention agencies
- Regulators and other authorities

We may also have a legitimate interest to disclose your information 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 Howe Tools or substantially all of its assets are acquired by a third party, personal data held about its customers will be one of the transferred assets.

We only provide the amount of data needed by third parties to perform their functions. They are not entitled to use or share your personal data for any other purpose. These third parties are subject to this Privacy Policy and EU data protection laws.

WHERE YOUR PERSONAL DATA IS STORED

The data that we collect from you will be stored by us within the European Economic Area ("EEA").

When sharing your data with third parties, your data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers.

Our suppliers are responsible for providing an adequate level of protection over your customer data in accordance with this privacy policy, contractual arrangements with us, and in accordance with the requirements of the EU data protection laws.

PAYMENT INFORMATION

- **Credit/debit card information.** Credit/ debit card information entered will be received directly by our payment provider using SSL Encryption. We do not you receive credit/ debit card information from our payment provider, other than the last four digits of the payment card and the expiry date. This is to assist us with fraud prevention, customer payment queries and refunds.

- **PayPal transactions.** When you pay via PayPal you will be taken to a PayPal website to complete your transaction. PayPal will provide us with your PayPal email address to assist with fraud prevention, customer payment queries and refunds.

RETENTION PERIOD OF DATA

Your data will be kept for as long as necessary, in relation to the purpose it was originally obtained for. Data may be kept for longer if there is a legal or regulatory requirement to do so.

AUTOMATED DECISION MAKING INCLUDING PROFILING

We do not make any automated decisions using your personal data.

If are opted-in to marketing communications and you decide to submit additional information to your Howe Tools website user account, such as your interests, we may use this information to provide you with tailored marketing communications. We may also use your purchase history to send you tailored marketing communication if you are opted-in to marketing communications.

If you want to withdraw your consent for marketing communications you can object by contacting us, by updating your user profile on the Howe Tools website, or through unsubscribing using the link in any email you receive from Howe Tools.

If you do not want to receive tailored marketing communications you can object by contacting us at sales@howetools.co.uk.

YOUR RIGHTS

- **The right to be informed.** You have the right to be informed about the collection and use of your personal data. This Privacy Policy provides you with details of how Howe Tools collect and uses your data.
- **The right of access.** You have the right to obtain confirmation that your data is being processed, access to your personal data, and other supplementary information. We will provide this information free of charge, unless the request is manifestly unfounded or excessive. We will provide this information to you within one month of receipt unless the request is complex or numerous, in which case this period may be extended to three months.
- **The right to rectification.** You have the right to rectify your personal data if it is inaccurate or incomplete. You can make changes to personal data we hold about you by logging into your Howe Tools website user account. If you request that we make changes to your personal data through contacting us directly we will complete the changes within one month unless the request for rectification is complex, in which case this could take three months.
- **The right to erasure.** You have the right to request the deletion or removal of your personal data where there is no compelling reason for its continued processing. This is also known as the ‘right to be forgotten’. You can exercise this right in the following circumstances:
 - If your personal data is no longer necessary in relation to the purpose for which it was originally collected or processed.

- If you have withdrawn consent.
 - If you object to the processing of your data, and there is no overriding legitimate interest for us to continue processing it.
 - If the personal data was unlawfully processed.
 - If the personal data has to be erased to comply with a legal obligation.
 - If the personal data is processed in relation to offering information society services to a child.
- **The right to restrict processing.** You have the right to ‘block’ or suppress processing of your personal data. We will stop processing your data in the following circumstances:
 - If you contest that your personal data is inaccurate, we will restrict processing until the accuracy of the data has been verified.
 - If you have objected to the processing of data (where it was necessary for the performance of a public interest task or for the purpose of legitimate interests), we will restrict processing your data until we understand if we have legitimate grounds to continue to process the data.
 - If the processing is unlawful and you would prefer to restrict your data, rather than erase it.
 - If we no longer require the data, but you need the data to establish, exercise or defend a legal claim.
 - **The right to data portability.** The right to data portability allows individuals to request their personal data in a structured, commonly used and machine readable format, such as CSV. This is useful if the data can be moved, copied or transferred easily from one IT environment to another.
 - **The right to object.** You have the right to object to:
 - your data being processed based on legitimate interests or for the performance of a task in the public interest/ exercise of an official authority (including profiling);
 - direct marketing (including profiling); and
 - the processing of your data for the purposes of scientific/historical research and statistics.

You can exercise the rights to access, rectification, erasure, restrict processing, data portability, or to object by contacting us at sales@howetools.co.uk.

COOKIES

We use cookies on our website. You can refuse cookies within your browser, but this may affect the usage of our website. By continuing to use our website you consent to the use of these cookies. For more information about cookies, please visit our [Cookie Policy](#).

SECURITY

The security of your personal data is taken very seriously by Howe Tools. All information that you submit on our website is encrypted by Secure Socket Layer.

To help prevent the use of your debit or credit card without your consent, we request that our payment provider verifies the payment information you have provided them. This may result in them performing verifications of your address and Card Verification Value, or of other advanced fraud checks.

AMENDMENTS

We may make changes to this Privacy Policy from time to time. Any changes to this Privacy Policy will be made to this page. If we make significant changes to this Privacy Policy we may email you to notify you of the changes made, so that you are aware of the changes and can request to have your details removed if you do not agree with them.

COMPLAINTS

Howe Tools takes the privacy of personal data extremely seriously, and has measures in place to keep your data secure and restricted to those that require it for a lawful basis.

If you are not happy about how your personal data has been used, please contact sales@howetools.co.uk and we will investigate and respond to your complaint.

You also have the right to complain to the Information Commissioner's Office about how your data has been handled. For details on how to do this, visit www.ico.org.uk.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to sales@howetools.co.uk.