HAGUE FASTENERS LIMITED

# Privacy Notice

Privacy notice | Customers, suppliers, website users, applicants and visitors

| DOCUMENT REF. | ISSUE | ISSUE DATE | REVIEW | OWNER |
|---|---|---|---|---|
| HF-PRIV | 5 | 13/11/2026 | Annually | Managing Director |

This notice explains what to expect when HAGUE FASTENERS LIMITED collects personal information, how we use it and your rights under UK GDPR and the Data Protection Act 2018. HAGUE FASTENERS LIMITED is the controller of the information described here, unless we say otherwise. The Company is registered with the ICO as a data controller (registration reference ZA336842, Tier 2, first registered 4 April 2018 and renewed annually; current registration expires 3 April 2027).

## 01 Who this notice covers

This notice applies to information we collect about:

- visitors to our website, and people who contact us by social media, telephone or email;
- customers, prospective customers and clients, including client portal account holders and people who respond to our client feedback surveys;
- suppliers and service providers, and advisers, consultants and other professional experts;
- businesses whose trade payment and credit data we use;
- complainants and enquirers;
- individuals captured by CCTV images;
- job applicants, and our current and former employees.

Our current employees receive a separate Employee Privacy Notice (HR-PRIV) with full details of how we handle employee data.

## 02 Our website

Our website, www.haguefasteners.co.uk, is built on WordPress and hosted by hosting.com, part of the team.blue group. Our website host stores the website, its database and its backups in data centres in Brussels, Belgium. Belgium is in the European Economic Area, which UK law recognises as giving adequate protection, and this data is not transferred outside the European Economic Area. Our own monthly website backups are stored with Dropbox, as explained under Who we share information with. We collect only what we need to run the website, answer your enquiries, manage client portal accounts and keep the site secure. Our website privacy notice and cookie settings are linked from the footer of every page.

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| **Enquiry form** | When you send an enquiry we collect your name, company, email address, telephone number, industry, your message and any drawings or files you attach. We use this to answer your enquiry, prepare a quotation and, if you place an order, to fulfil it. The legal basis is taking steps at your request before entering into a contract, and our legitimate interest in responding to business enquiries.<br>Enquiries are emailed to our sales team. Unless you tick the opt-out box on the form, we may add your business contact details to our e-newsletter list (see E-newsletter below). Files you attach are held on the web server only while the email is sent, then deleted. Apart from the website email log described under Website emails, which is deleted after 14 days, the website does not keep a copy of your enquiry.<br>Please do not upload OFFICIAL-SENSITIVE or other classified documents through the form. Contact us and we will arrange a secure route. |
| **Spam protection** | The enquiry form checks how it was filled in (a hidden field, the time taken and a limit of 3 links per message) and uses Google reCAPTCHA v3, on the Contact page only, which looks at your IP address and how you use the page to tell people from automated programs. The legal basis is our legitimate interest in protecting the form from abuse. |
| **Client portal accounts** | Customers, prospective customers and suppliers apply for their own account to use our client download portal. We collect your name, company, work email address and how you work with us (existing customer, prospective customer, supplier or other). Your job title, phone number and comments are optional. We also record the dates of your application, approval and last sign-in, and your privacy consent tick.<br>We use this to check and approve applications, give you access to our client documents and manage your account. The legal basis is our legitimate interest in sharing supplier approval documents securely, and taking steps at your request.<br>Your account is kept until you delete it under My account or ask us to remove it. Declined applications are deleted straight away. We keep a record of applications, approvals, declines and deletions (date, name, company and email address) for 12 months. Account details are held in our website database with our hosting provider in Brussels, Belgium, in the European Economic Area.<br>To block spam and repeated sign-in attempts, the website briefly keeps a coded (hashed) form of your IP address, for one hour at most. A hidden field also checks for automated form filling.<br>When a document is opened we keep a short log of the date and time, the document name and a shortened IP address (the last part removed), so we can see which documents are used and spot misuse. The log is kept for up to 12 months. The legal basis is our legitimate interest in protecting company documents. |
| **Website emails** | Emails sent by the website, such as portal applications, approvals, password resets and contact form messages, are sent through our Microsoft 365 email service from sales@haguefasteners.co.uk. Microsoft acts as our processor for this. The website keeps a log of the emails it sends (recipient, subject and content) for 14 days, then deletes it. |

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| **Security** | Our website security software (Wordfence, provided by Defiant Inc.) and our hosting provider record IP addresses and technical details of requests to protect the site against attacks. Website security logs are kept for up to 30 days and used only for security. Our hosting provider keeps its web server logs, which include IP addresses, for up to 7 days, used only for security and operation. Our own website backups, which include this information, are made monthly, stored securely off the web server with Dropbox and kept for up to 5 months; our hosting provider's own backups are kept for up to 30 days. The legal basis is our legitimate interest in keeping the website and your data secure. |
| **Analytics and cookies** | With your consent, we use Google Analytics to understand how visitors use the site. It uses cookies and processes your IP address and device information; we do not use it to identify you. We keep Google Analytics data for 14 months, after which it is deleted automatically.<br>We use the iubenda Cookie Solution (iubenda s.r.l., Italy) to ask for and record your consent. Google tags are held back until you accept, and you can change your choice at any time using the Cookie settings link at the bottom of every page. Strictly necessary cookies (consent choices, signing in to the client portal and staff login) are used without consent. |
| **Embedded content** | Some older news articles show videos from YouTube. They are embedded in YouTube's privacy-enhanced mode, which does not set cookies until you play a video, but loading them shares your IP address with Google.<br>Our Instagram page shows photos from our Instagram account, loaded from Meta's servers. This sets no cookies, but your browser's request shares your IP address with Meta. |

## 03 Cookies used on our website

Strictly necessary cookies are used without consent because the site cannot work without them. All other cookies are set only if you agree.

| Cookie | Set by | Purpose | Type | Lifetime |
|---|---|---|---|---|
| **_iub_cs-*, _iub_previous_preference_id** | iubenda | Remembers your cookie choices and keeps a record of earlier choices | Strictly necessary | 6 months |
| **wordpress_logged_in_*, wordpress_sec_*** | WordPress | Keeps you signed in to the client portal (also used for staff login) | Strictly necessary | Until the browser closes, or 14 days if you tick Remember me |
| **wordpress_test_cookie** | WordPress | Checks that your browser accepts cookies | Strictly necessary | Until the browser closes |
| **wfwaf-authcookie-*** | Wordfence | Staff login, website firewall | Strictly necessary | 12 hours |
| **_GRECAPTCHA** | Google reCAPTCHA (Contact page only) | Spam protection | Strictly necessary (security) | 6 months |

| Cookie | Set by | Purpose | Type | Lifetime |
|---|---|---|---|---|
| **_ga, _ga_*** | Google Analytics | Analytics | Consent only | 2 years |

## 04 People who contact us

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| **E-newsletter** | We send occasional business e-newsletters about our products, services, capabilities and company news to the business contacts of our customers and of organisations that have asked us for a quotation or information. For contacts at limited companies, limited liability partnerships and public bodies, we do this under our legitimate interest in keeping business customers and enquirers informed. For sole traders and partnerships, we rely on the soft opt-in: we email you only if you have bought from us or asked us for a quotation, only about similar products and services, and only if you were given the chance to opt out when we collected your details.<br>You can opt out at any time, free of charge, using the unsubscribe link in every newsletter, the opt-out box on our enquiry form, or by emailing sales@haguefasteners.co.uk. Opt-outs are actioned promptly, and within 10 working days at the latest. You have an absolute right to object to direct marketing, and once you opt out we will not send you newsletters again.<br>Newsletters are sent through Mailing Manager, a trading name of IHM Limited, which processes subscriber details on our behalf under UK GDPR processor terms. We collect statistics on email opening and clicks to monitor and improve the newsletter. If a mailing list is not used for 24 months, Mailing Manager removes its subscriptions automatically, and open and click statistics are deleted after 18 months. If you unsubscribe or complain, your email address is kept on a suppression list only so that you are not emailed again. If we close the account, Mailing Manager deletes our data from its live servers within 3 months, and its backups rotate after 1 month. |
| **Social media** | If you send us a private or direct message through social media, the message is stored by the social media provider. We do not share it with any other organisation. |
| **Telephone** | When you call us, we collect Calling Line Identification (CLI) information. We use it to improve our efficiency and service. |
| **Email** | We use Transport Layer Security (TLS) to encrypt and protect email traffic. If your email service does not support TLS, emails we send or receive may not be protected in transit.<br>We monitor emails sent to us, including attachments, for viruses or malicious software. You are responsible for making sure any email you send is within the law. |

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| **Client feedback** | Client feedback surveys, which support our continual improvement and performance management, are processed by SurveyMonkey Europe UC. If you respond, we collect the data you submit and your IP address. This information is kept for two years and is not shared with any other organisation. Feedback surveys ask only about our service and contain no marketing. The legal basis is our legitimate interest in improving our service, and you can ask us at any time not to send them. See SurveyMonkey's privacy policy. |

## 05 Trade payment data and credit risk

We work with Creditsafe (Creditsafe Business Solutions Limited, authorised and regulated by the Financial Conduct Authority, FRN 742313) to onboard and monitor customers and suppliers. Through its automated service, linked to our ledgers, we access global company information, consumer credit data (from Equifax, TransUnion and GBG), identity verification, anti-money laundering (AML), politically exposed person (PEP) and sanctions checks.

- We screen prospective customers and suppliers against global PEP and sanctions lists, monitor PEPs, sanctions and adverse news, and verify the ownership of business bank accounts to reduce fraud.
- Company and director information comes from official registries and is combined with a Creditsafe credit score. Credit information may be used to assess affordability and to support credit decisions.
- Live data from our ledgers is shared with Creditsafe, which analyses payment performance against agreed terms (days beyond terms). Late payment of our sales invoices may therefore affect a customer's credit risk score.

See the Creditsafe data and privacy policy for more information.

## 06 Job applicants and former employees

We use the information you provide during the recruitment process only to progress your application, or to meet legal or regulatory requirements. We will not share it with third parties for marketing purposes or store it outside the UK, and we hold it securely in electronic or paper form. Queries about recruitment can be sent to sales@haguefasteners.co.uk.

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| **Application** | Name and contact details, previous experience, education, referees and answers to questions relevant to the role. Equal opportunities information is optional, does not affect your application, is not shown in an identifiable form to anyone outside the recruitment team and is used only for equal opportunities statistics. |
| **Shortlisting** | Hiring managers shortlist applications without your name, contact details or equal opportunities information. |
| **Assessment** | We may ask you to attend assessment days, complete tests or occupational personality questionnaires and/or attend an interview. Information generated, such as test results and interview notes, is held by the Company. If you are unsuccessful, we may ask whether you would like your details kept in our talent pool for six months. |
| **Conditional offer** | We carry out pre-employment checks to confirm your identity, your right to work in the UK and your trustworthiness, integrity and reliability: proof of identity and of qualifications (originals seen, copies taken), a criminal records declaration of any unspent convictions, references obtained directly from your referees, and a health questionnaire to establish fitness to work. |
| **Final offer** | Bank details to pay your salary, and emergency contact details. |

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| **Decisions** | Final recruitment decisions are made by hiring managers and the recruitment team, taking account of all the information gathered. You can ask about decisions on your application by contacting the recruitment team. |

**Retention.** If you are successful, information from your application, including your criminal records declaration, fitness to work, security checks and references, is kept on your employee file for the duration of your employment plus 6 years. If you are unsuccessful, the information you provided, information generated during assessment (such as interview notes) and equal opportunities information are kept for 9 months from the closure of the vacancy, so that we can respond to any legal claim (an Employment Tribunal claim can be started up to 6 months after a decision, plus any time spent in early conciliation). Evidence of personal protective equipment and health and safety records, showing only your name, is kept in a secure archive so it can be recalled if a claim is brought about a latent industrial injury.

## 07 CCTV

Our CCTV system is controlled by the Managing Director and is used only for the prevention and detection of crime and for protecting the health and safety of our employees and visitors. Signs show where CCTV is in operation. Recordings are deleted after 14 days unless needed to investigate an incident. Images are disclosed only to authorised parties such as the police, and service providers who reasonably need access (for example investigators). You can ask for footage of yourself; we respond within one month. We may refuse access where it would prejudice the rights of others or an ongoing investigation. Full details are in our CCTV Policy (HF-POL-CCTV).

## 08 Why we use personal information

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| **Contract** | To quote, take and fulfil orders, buy goods and services, and manage accounts with customers and suppliers, to open a client portal account at your request, and to take steps before entering into an employment contract with a job applicant. |
| **Legal obligation** | To keep accounting, tax and other records the law requires, and to check a job applicant's right to work in the UK. |
| **Legitimate interests** | To manage customer and supplier relationships, assess credit risk and prevent fraud, respond to enquiries and complaints, send business e-newsletters to business contacts, ask customers for feedback on our service, share supplier approval documents securely through client portal accounts, protect our enquiry form and client download portal, improve our service and website, keep our systems secure and operate CCTV. Our assessment of these interests for newsletters and feedback surveys is recorded in our Legitimate Interests Assessment (HF-LIA-01), available on request. |
| **Consent** | For analytics cookies and optional equal opportunities information. You can withdraw consent at any time. |

## 09 Who we share information with

We do not sell personal information. We share it only with service providers who act on our instructions and keep it secure, including our website host (hosting.com, part of the team.blue group), our email and IT providers (Microsoft 365, which also sends the emails from our website as our processor), iubenda (consent records), Defiant Inc. (Wordfence website security, United States), Google (analytics, with consent, reCAPTCHA on the enquiry form, and YouTube), Meta (Instagram images), Mailing Manager (IHM Limited, e-newsletters), Dropbox

(website backups), Creditsafe, SurveyMonkey, our accountants and professional advisers, couriers delivering your order, and authorities where the law requires. Client order documents, such as material certificates, are occasionally shared with clients as secure Microsoft 365 OneDrive links.

Some providers, such as Google, Meta, Microsoft, SurveyMonkey, Defiant (Wordfence), Mailing Manager and Dropbox, may process data outside the UK, including in the United States. Where they do, the transfer is protected by UK adequacy regulations (including the UK Extension to the EU-US Data Privacy Framework) or by the UK International Data Transfer Agreement or Addendum.

## 10 How long we keep information

We keep personal information only as long as we need it for the purpose it was collected for, then delete or anonymise it, in line with our Data Retention Schedule (HF-REG-RET). As a guide: website enquiries that do not lead to an order, up to 2 years; quality, traceability and customer-specific records, at least 10 years (longer where a contract or a safety-critical industry requires it); accounting records, 6 years from the end of the financial year; client portal accounts, until you delete your account or ask us to remove it (declined applications are deleted straight away); record of client portal applications, approvals, declines and deletions, 12 months; client download portal log, 12 months; website email log, 14 days; coded IP addresses used to block spam and repeated sign-in attempts, up to one hour; customer survey responses, 2 years; e-newsletter subscribers, until you unsubscribe, or 24 months after the list was last used; e-newsletter open and click statistics, 18 months; CCTV recordings, 14 days unless needed for an incident; cookie consent choices, 6 months; website backups, up to 5 months; recruitment records as described above.

## 11 Your rights

You have the right to be informed about how we use your information; to access it; to have it corrected; to have it erased or its use restricted in certain circumstances; to object to processing based on our legitimate interests; to data portability; and not to be subject to decisions based solely on automated processing that significantly affect you.

To find out whether we hold information about you, make a subject access request to "The Data Controller" at the address below. You can ask verbally or in writing, although a written request helps us respond accurately. If we hold information about you, we will describe it, tell you why we hold it and who it could be disclosed to, and give you a copy in an intelligible form. If you agree, we may deal with your request informally, for example by giving you the specific information you need over the telephone.

We respond to requests within one month, extendable by up to two further months for complex or multiple requests. There is normally no fee. You can ask us to correct any mistakes by contacting "The Data Controller".

## 12 Complaints

We take any complaint about our use of personal information seriously. If you are unhappy with how we have used your information, please complain to us first by emailing sales@haguefasteners.co.uk or writing to The Data Controller at the address below. We will acknowledge your complaint within 30 days and tell you the outcome without undue delay. We also welcome suggestions for improving our procedures.

If you are not satisfied with our response, you can complain to the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone 0303 123 1113, or ico.org.uk.

## 13 Contact us and changes to this notice

Email sales@haguefasteners.co.uk, or write to The Data Controller, HAGUE FASTENERS LIMITED, Monmer Close, Willenhall, West Midlands, WV13 1JR.

This notice is not an exhaustive description of every aspect of how we collect and use personal information, and we are happy to provide more detail on request. We keep it under regular review; the issue date is shown above.

## APPROVED AND SIGNED

**SIGNATURE**



**DATE**
**13/11/2026**

**NAME**
**Jon Hague**

**POSITION**
**Managing Director, HAGUE FASTENERS LIMITED**

## REVISION HISTORY

| Issue | Date | Details of change |
|---|---|---|
| 5 | 13/11/2026 | Website changes of 13/11/2026: client download portal moved from a shared password to individual accounts (information collected, purposes and legal basis, retention, coded IP address and hidden-field security checks, hosting location); client portal password cookie replaced by the WordPress sign-in cookies and wordpress_test_cookie; website emails sent through Microsoft 365 as our processor, with a 14-day email log; iubenda cookie purpose extended to keeping a record of earlier choices; who this notice covers, legal bases, who we share with, overseas transfers and retention list updated to match. |
| 4 | 28/10/2026 | Cookie consent test of 27/10/2026: iubenda consent cookies corrected to 6 months (was 12) and _iub_previous_preference_id added to the cookie table; cookie consent choices kept 6 months in the retention list. 28/10/2026: hosting confirmed in writing by hosting.com: website, database and host backups in Brussels, Belgium (EEA), not transferred outside the EEA; web server logs kept up to 7 days; host backups up to 30 days. Our own monthly website backups (UpdraftPlus, kept up to 5 months) named as stored with Dropbox; Dropbox added to who we share with and overseas transfers. Website notice updated to match. |
| 3 | 12/10/2026 | Redesigned. Updated to UK GDPR and the Data Protection Act 2018; cookie consent through website banner; LiveChat removed; newsletter, transfers and single contact (sales@haguefasteners.co.uk) updated; lawful bases, rights, ICO registration and contact details added. 26/10/2026: aligned with the new website (live 26/10/2026): host hosting.com; enquiry form, attachments, reCAPTCHA, client download portal log, Wordfence and iubenda added; comments and search logging removed; who we share with, overseas transfers and retention periods (HF-REG-RET) stated; complaints to the Company first, acknowledged within 30 days (Data (Use and Access) Act 2025). 26/10/2026: website project report-back added: host named as part of the team.blue group with UK or EEA hosting (interim until confirmed), security logs up to 30 days, backups up to 5 months, Google Analytics kept 14 months, cookie table, YouTube privacy-enhanced embeds, classified upload warning; matches the live website notice. 26/10/2026: e-newsletter section updated with Mailing Manager (IHM Limited) processor terms and retention periods; newsletters sent to business contacts of customers and enquirers with an opt-out (legitimate interests for corporate contacts, soft opt-in for sole traders and partnerships); feedback surveys stated as not marketing; 24-month removal corrected to apply to lists not used for 24 months; Legitimate Interests Assessment (HF-LIA-01) referenced; Mailing Manager added to the overseas transfers sentence; checked against the live website notice 26/10/2026 (matches). 27/10/2026: unsuccessful applicant records kept 9 months (6-month tribunal time limit). |
| 2 | 04/02/2022 | Complete Privacy Notice updated, including Creditsafe trade payment data. |