

## Milking Solutions Privacy Notice

### *1. Introduction*

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here but we want you to be fully informed about your rights, and how Milking Solutions uses your data.

For example, we will explain things such as our credit checking procedure.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

When you are using the Milking Solutions website, Milking Solutions (UK) Ltd is the data controller.

### *2. Who is Milking Solutions (UK) Ltd?*

Milking Solutions (UK) Ltd is a manufacturer and supplier of spare parts and equipment within the milking machine industry. In particular, we specialise in parts for Gascoigne Melotte milking machines. Parts are available through a worldwide network of milking machine service companies.

Reference to the Company will often be abbreviated to Milking Solutions or simply MS in some literature. Throughout this notice 'we' and 'us' also means the Company.

This Privacy Notice applies also to international orders, but there are additional terms for some countries. You'll find more information in section 14.

### *3. Explaining the legal bases we rely on*

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### **Consent**

In specific situations, we can collect and process your data with your consent. For example, when you tick a box to receive email newsletters. When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

#### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you order an item from us for delivery, we'll collect your address details to deliver your purchase, and pass them to our courier.



## **Legal compliance**

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting Milking Solutions to law enforcement.

## **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history to send you or make available personalised offers. We also combine the shopping history of many customers to identify trends and ensure we keep appropriate stock levels, or develop new products. We will also use your address details to send you direct marketing information by post, telling you about products that we think might interest you.

### ***4. When do we collect your personal data?***

When you place an order with the sales office by phone, email, fax or in person.

When you visit our website and use your account to buy products.

When you create an account with us.

When you contact us by any means with queries, complaints etc. This includes exhibitions and trade shows.

When you ask one of our staff to email you information about a product or your account.

When you choose to complete any surveys we send you.

When you engage with us on social media.

When you fill in any forms. For example, if an accident happens on site, staff may collect your personal data.

When you've given a third party permission to share with us the information they hold about you.

We collect data from publicly available sources (such as Companies House) when you have given your consent to share information or where the information is made public as a matter of law.

### ***5. What sort of personal data do we collect?***

If you have an account with us: your name, billing/delivery address, orders and receipts, email and telephone number.

Details of your interactions with us through any means, including contact with the office staff and online.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, products you show interest in, and how and when you contact us.

Details which help us to recommend items of interest. For example, you might tell us which vacuum pump you have, which we'll use to guide our suggested service items.

We'll only ask for and use your personal data collected for recommending items of interest and to tailor your purchasing experience with us. Of course, it's always your choice whether you share such details with us.



Your comments and product reviews.

Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

### *6. How and why do we use your personal data?*

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you. The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service. Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for. For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.

#### **Here's how we'll use your personal data and why:**

To process any orders that you make by using our website or via the office. If we don't collect your personal data at that time, we won't be able to process your order and comply with our legal obligations.

For example, your details may need to be passed to a third party to supply or deliver the goods that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees, warranties and so on.

To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest. For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent logins from unexpected locations.

To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.



If we discover any criminal activity or alleged criminal activity through our use of fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.

With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by **email, post or telephone** about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

To send you relevant, personalised communications **by post** in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.

To display the most interesting content to you on our website, we'll use data we hold about your favourite brands or products and so on. We do so on the basis of your consent for our website to place cookies or similar technology on your device. For example, we might display a list of items you've recently looked at, or offer you recommendations based on your purchase history and any other data you've shared with us.

To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests. For example, we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having.

To comply with our contractual or legal obligations to share data with law enforcement. For example, when a court order is submitted to share data with law enforcement agencies or a court of law.

To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time

Sometimes, we'll need to share your details with a third party who is providing a service, such as delivery couriers.

Without sharing your personal data, we'd be unable to fulfil your request.



### *7. How we protect your personal data–*

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our website using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information is secured and tokenized to ensure it is protected.

Our IT partner will regularly monitor our system for possible vulnerabilities and attacks, and carry out penetration testing to identify ways to further strengthen security.

### *8. How long will we keep your personal data?*

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, so that it can be used in a non-identifiable way for business planning.

### *9. Who do we share your personal data with?*

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, for fraud management, to handle complaints and so on.

**Here's the policy we apply to those organisations to keep your data safe and protect your privacy:**

We provide only the information they need to perform their specific services.

They may only use your data for the exact purposes we specify in our contract with them.

We work closely with them to ensure that your privacy is respected and protected at all times.

If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

**Examples of the kind of third parties we work with are:**

IT companies who support our website and other business systems.

Operational companies such as delivery couriers.

**Sharing your data with third parties for their own purposes:**

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.



## *10. Where your personal data may be processed*

Your personal data will only be processed in the UK.

## *11. What are your rights over your personal data?*

### **An overview of your different rights**

You have the right to request:

Access to the personal data we hold about you, free of charge in most cases.

The correction of your personal data when incorrect, out of date or incomplete.

That we stop using your personal data for direct marketing (either through specific channels, or all channels).

That we stop any consent-based processing of your personal data after you withdraw that consent.

Review by staff of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).

You can contact us to request to exercise these rights at any time as follows:

**To ask for your information or amendments, please contact us at Milking Solutions (UK) Ltd., 43 Drybridge Street, Monmouth, NP25 5AD UK or email [info@milking-solutions.co.uk](mailto:info@milking-solutions.co.uk)**

If we choose not to action your request we will explain to you the reasons for our refusal.

### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **Where we rely on our legitimate interest**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

### **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.



## *12. How can you stop the use of your personal data for direct marketing?*

There are several ways you can stop direct marketing communications from us:

Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular function.

Write to us at the main office address, shown near the top of this page. Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## *13. Contacting the Regulator-*

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the **Information Commissioner's Office**.

You can contact them by calling **0303 123 1113**. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 14.

## *14. If you live outside the UK-*

### **For all non-UK customers**

This Privacy Notice will be available in English and later in other European languages. In case of any dispute about its meaning, the English version will take precedence.

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

This may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers in the UK.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.



We'll ensure that any third parties process your personal data only in accordance with their legitimate interests. These third parties may be subject to different laws from those which apply in your country of residence. Please note that we do not take active steps to ensure that any overseas recipient of your personal data complies with the laws which apply in your country.

### **Australia**

For the purposes of this Privacy Notice, 'personal data' means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true, and whether or not the information or opinion is recorded in a material form.

If you are in Australia you may submit any questions, comments or complaints to our UK-based office who will come back to you within 30 days.

If you are contacting us to complain about an alleged breach of this Privacy Notice or our legal privacy obligations, please provide us with as much detail as possible in relation to your complaint.

We will take every privacy complaint seriously and assess it with the aim of resolving all issues quickly and efficiently. We'd be grateful for your cooperation with us during this process by providing us with any relevant information that we made need.

If we have not come back to you within 30 days, or you are not happy with the response that you've received, you may submit a complaint to the [Office of the Australian Information Commissioner](#).

We are committed to keeping your personal information secure and will take all reasonable precautions to protect it from loss, misuse or unauthorised access or alteration. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information.

Nothing in this Privacy Notice restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth).

### **USA**

To learn more about our cookies and website 'track' and 'do not track' practices [please see our Cookies Notice](#).

### **Canada**

As your data may be transferred to third parties outside Canada, local police or other enforcement, regulatory or Government bodies may have access to that data, with or without our knowledge.

The personal data we process may be accessed by people within Milking Solutions, or by our third-party service providers, who require access for the purposes indicated in this Privacy Notice, or as may be permitted or required by applicable law. The personal data we collect is held in the UK.





**Milking Solutions**



43, Drybridge Street  
Monmouth  
NP25 5AD

Tel: 01600 772211

Fax: 01600 772210

email: [info@milking-solutions.co.uk](mailto:info@milking-solutions.co.uk)

web: [www.milking-solutions.com](http://www.milking-solutions.com)

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal information, you have the right to lodge a complaint with the Office of the Privacy Commissioner of Canada, or in some Canadian provinces, your local Privacy Commissioner.

#### **South Korea, Malaysia, Singapore, Qatar**

Terms used in this Privacy Notice shall have the meanings assigned to them by the Personal Data Protection Act 2010 (also known as the PDPA).

By placing an order with us, opening an account, browsing our website and/or agreeing to receive digital direct marketing communications, you agree that we may process your personal data as described in this Privacy Notice and our Cookies Notice, including for analytics and research into website use.

#### **Hong Kong**

When you agree to receive direct marketing emails from us, we'll send you promotions on products we sell.

If you are in Hong Kong you may submit a complaint to our UK-based Data Protection Officer who will come back to you within 30 days. If we have not come back to you or you are not happy with the response that you receive, you may submit a complaint to the Office of the Privacy Commissioner for Personal Data.

#### ***15. Any questions?***

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact us as below, we are happy to help:

Email us on [info@milking-solutions.co.uk](mailto:info@milking-solutions.co.uk)

Or write to us at

**Milking Solutions (UK) Ltd.**

**43 Drybridge Street, Monmouth. NP25 5AD**

**United Kingdom**

This notice was last updated on 21/05/18