



HSM Global - Privacy Policy

1. Overview

HSM Global has put in place policies and procedures to manage our client data, including personal data, in line with the Data Protection Act 1988 and the more recent GDPR regulations. This Privacy Policy applies to suppliers, customers and sub-contractors.

This document outlines how we collect and use personal information, how we meet our obligations as a data controller and as a data processor. It may be updated from time to time and the latest version is available at <http://www.hsmglobal.co.uk/privacy>.

2. Is HSM Global a Data Controller or Data Processor?

HSM Global is defined as a data processor for the personal data that we use during our business transactions. As a data processor we may collect end user name, address, telephone and other contact details as required to enable us to carry out our contractual commitments to our customers. This data

- Will only be used by staff who have a business need to access the data and will only be shared with those 3rd parties who enable us to perform those obligations.
- Will be stored securely.
- Will be retained for a maximum of 7 years in order to enable us to comply with our legal obligations, after which time it will be deleted.

3. Does HSM Global have a Data Protection Officer (DPO)?

Yes, we do. The DPO is part of the Executive Team and is responsible for overseeing that HSM Global is meeting its obligations to Data Protection laws and regulations. The DPO is the contact for all Data Privacy related queries including Data Access Requests. The DPO can be contacted at dpo@hsmglobal.co.uk

4. What personal data do we collect?

When customers open an account with HSM Global we will collect some or all of the following personal data.

- Name, Email address, telephone, mobile and fax numbers, postal address, business contact and billing information.
- Business information for credit applications including trade references, company registration number, VAT Number and trading period.

When customers order from HSM Global we collect additional information including:

- Contact details for processing the order,
- Pickup and Delivery details to enable delivery – including names, addresses and contact details.
- Details of items to be delivered to enable special handling (e.g. dangerous goods) and customs clearance if required.



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5. How do we use this data?

When opening an account with HSM Global, consent to use personal data will be requested for the following purposes

- To enable us to confirm business details when setting up an account for legal, financial and contractual purposes so we can provide commercial services to our customers
- To carry out basic checks for due diligence when setting up accounts to ensure all details are genuine and correct and to avoid fraudulence
- To allow us to comply with legal requirements placed upon us.

When ordering from HSM Global we will need customer pickup and delivery addresses and details of goods being transported for the following purposes

- To enable the correct delivery of goods
- To facilitate accurate billing
- To organise appropriate paperwork, e.g. dangerous goods, and customs clearance if required.

We will retain data for the duration of relationship and to comply with legal requirements. For legal requirements data will be retained for a minimum of seven years.

6. Who has access to personal data?

Personal data is only accessible to those who have a business need.

7. Who do we share personal data with?

Information is only shared with third parties as required to enable us to comply with the law, to setup and transact our business together and to provide the services contracted, i.e.

- Credit agencies in order to confirm credit status of our customers.
- Drivers, including sub-contractors, in order to facilitate pickup and delivery.
- Customs agencies to arrange dangerous goods and customs clearance paperwork.

In each case our processes will comply with GDPR and other relevant privacy regulations in order to safeguard this data.

8. How are corrections to data carried out?

If details of pickup/delivery locations, or goods to be transported, change, you can notify us by phone and we will update our records and documentation accordingly. If you believe we have any incorrect personal information you may request to change or to see this data. We will provide the data within 30 days at no charge. If you are requesting more detailed data that requires significant resourcing we may make a nominal charge to cover our costs.

Any requests to change or see personal data can be made by phone or by email to dpo@hsmglobal.co.uk.

9. Does HSM Global have a central repository for data processing activities?

Yes, HSM Global maintains a GDPR compliant data processing repository which is reviewed and updated on an ongoing basis.



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10. How does HSM Global manage Storage and Security of data, including personal data?

We take great care to keep all data secure. A combination of physical and electronic controls and management processes ensure data is protected at all times. All data is physically stored in the UK at HSM Global owned facilities. Internal tracking and audits are carried out to ensure employee compliance.

11. How does HSM Global manage Data Breaches?

The DPO and Executive team are responsible for ensuring correct processes and procedures are documented and followed in relation to a breach in data security including reporting of the breach to any affected customer or relevant third party.

12. Is HSM Global registered with the ICO?

No. Due to the nature of our business and the personal data collected it is not a requirement for HSM Global to be registered with the ICO. We are, however, fully committed to complying with all legal regulations and to following ICO guidelines for protecting our data.

13. How are changes to this policy managed?

We may occasionally make changes to this policy in order to ensure legal compliance and to maintain alignment with best practice. The latest version of this document is available at <http://www.hsmglobal.co.uk/privacy>.

14. Who is the HSM Global contact for Data Privacy?

Our Privacy Policy is overseen by the DPO and Executive team who can be contacted at dpo@hsmglobal.co.uk.