



## GDPR - Privacy Policy

Thank you for your interest in our website. Data protection is of a particularly high priority for the management of Harmony. The use of the Internet pages of Harmony is possible without submitting any personal data, however if a visitor wants to use special services via our web site, such as purchases, membership or contacting us, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the visitor.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a visitor shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Harmony. By means of this data protection declaration, our web site would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, visitors are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, Harmony has implemented numerous technical and organisational measures to ensure the most complete protection of personal data that is processed through this web site. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every visitor is free to transfer personal data to us via alternative means, e.g. by telephone, email etc.

### 1. Definitions

The data protection declaration of Harmony is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

#### a) Personal data

Personal data means any information relating to an identified or identifiable natural person ("visitor"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an on-line identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

b) Visitor

Visitor is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c) Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f) Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific visitor without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

h) Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i) Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules

according to the purposes of the processing.

j) Third party

Third party is a natural or legal person, public authority, agency or body other than the visitor, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

k) Consent

Consent of the visitor is any freely given, specific, informed and unambiguous indication of the visitor's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## 2. Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

The IT Manager.  
Harmony A E Ltd  
Wharf House  
Dauntsey Lock, Chippenham SN15 4HD  
United Kingdom

Phone: 01249890789

Email: [admin@harmonycbc.co.uk](mailto:admin@harmonycbc.co.uk)

Website: <https://harmonycbc.co.uk>

## 3. Collection of general data and information

The website of Harmony collects a series of general data and information when a visitor or automated system calls up the website. This general data and information are stored in the server log files. Collected information may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the web site from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Harmony does not draw any conclusions about the visitor. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimise the content of our web site as well as its advertisement, (3) ensure the

long-term viability of our information technology systems and web site technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Harmony analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a visitor.

#### **4. Registration on our website**

The visitor has the possibility to register on the website of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the visitor are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors (e.g. a parcel service or payment processor) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the visitor, date and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offences. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the visitor, with the voluntary indication of personal data, is intended to enable the controller to offer the visitor contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data records of the controller.

The data controller shall, at any time, provide information upon request to each visitor as to what personal data are stored about the visitor. In addition, the data controller shall correct or erase personal data at the request or indication of the visitor, insofar as there are no statutory storage obligations. The entirety of the controller's employees are available to the visitor in this respect as contact persons.

#### **5. Contact possibility via the website**

The website of Harmony contains information that enables a quick electronic contact to our Harmony, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a visitor contacts the controller by e-mail or via a contact form, the personal data transmitted by the visitor are automatically stored.

Such personal data transmitted on a voluntary basis by a visitor to the data controller are stored for the purpose of processing or contacting the visitor. There is no transfer of this personal data to third parties.

## 6. Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the visitor only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

## 7. Rights of the visitor

### a) Right of confirmation

Each visitor shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a visitor wishes to avail himself of this right of confirmation, he or she may, at any time, contact [admin@harmonycbc.co.uk](mailto:admin@harmonycbc.co.uk).

### b) Right of access

Each visitor shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the visitor access to the following information:

the purposes of the processing;

the categories of personal data concerned;

the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;

where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the visitor, or to object to such processing;

the existence of the right to lodge a complaint with a supervisory authority;

where the personal data are not collected from the visitor, any available information as to their source;

the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the visitor.

Furthermore, the visitor shall have a right to obtain information as to whether personal data

are transferred to a third country or to an international organisation. Where this is the case, the visitor shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a visitor wishes to avail himself of this right of access, he or she may, at any time, contact [admin@harmonycbc.co.uk](mailto:admin@harmonycbc.co.uk).

#### c) Right to rectification

Each visitor shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the visitor shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a visitor wishes to exercise this right to rectification, he or she may, at any time, contact [info@harmonycbc.co.uk](mailto:info@harmonycbc.co.uk).

#### d) Right to erasure (Right to be forgotten)

Each visitor shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.

The visitor withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

The visitor objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the visitor objects to the processing pursuant to Article 21(2) of the GDPR.

The personal data have been unlawfully processed.

The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a visitor wishes to request the erasure of personal data stored by Harmony, he or she may, at any time, contact [trevorm@harmonycbc.co.uk](mailto:trevorm@harmonycbc.co.uk). An employee of Harmony shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the visitor has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employees of Harmony will arrange the necessary measures in individual

cases.

e) Right of restriction of processing

Each visitor shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

The accuracy of the personal data is contested by the visitor, for a period enabling the controller to verify the accuracy of the personal data.

The processing is unlawful and the visitor opposes the erasure of the personal data and requests instead the restriction of their use instead.

The controller no longer needs the personal data for the purposes of the processing, but they are required by the visitor for the establishment, exercise or defence of legal claims.

The visitor has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the visitor.

If one of the aforementioned conditions is met, and a visitor wishes to request the restriction of the processing of personal data stored by Harmony, he or she may at any time contact [admin@harmonycbc.co.uk](mailto:admin@harmonycbc.co.uk). The employee of Harmony will arrange the restriction of the processing.

f) Right to data portability

Each visitor shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the visitor shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the visitor may at any time contact [info@harmonycbc.co.uk](mailto:info@harmonycbc.co.uk).

g) Right to object

Each visitor shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Harmony shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the visitor, or for the establishment, exercise or defence of

legal claims.

If Harmony processes personal data for direct marketing purposes, the visitor shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the visitor objects to Harmony to the processing for direct marketing purposes, Harmony will no longer process the personal data for these purposes.

In addition, the visitor has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Harmony for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the visitor may contact any employee of Harmony. In addition, the visitor is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

h) Automated individual decision-making, including profiling

Each visitor shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the visitor and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the visitor's rights and freedoms and legitimate interests, or (3) is not based on the visitor's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the visitor and a data controller, or (2) it is based on the visitor's explicit consent, Harmony shall implement suitable measures to safeguard the visitor's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the visitor wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact [admin@harmonycbc.co.uk](mailto:admin@harmonycbc.co.uk).

i) Right to withdraw data protection consent

Each visitor shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the visitor wishes to exercise the right to withdraw the consent, he or she may, at any time, contact [admin@harmonycbc.co.uk](mailto:admin@harmonycbc.co.uk)



## **8. Legal basis for the processing**

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the visitor is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If Harmony is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the visitor or of another natural person. This would be the case, for example, if a visitor were injured in Harmony and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the above mentioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by Harmony or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the visitor which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the visitor is a client of the controller (Recital 47 Sentence 2 GDPR).

## **9. The legitimate interests pursued by the controller or by a third party**

Where the processing of personal data is based on Article 6(1) lit. f of GDPR our legitimate interest is to carry out our business in favour of the well-being of all our employees and/or shareholders.

## **10. Period for which the personal data will be stored**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

## **11. Provision of personal data as statutory or contractual requirement;**

Requirement necessary to enter into a contract; Obligation of the visitor to provide the personal data; possible consequences of failure to provide such data  
We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the visitor provides us with

personal data, which must subsequently be processed by us. The visitor is, for example, obliged to provide us with personal data when Harmony signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the visitor could not be concluded. Before personal data is provided by the visitor, the visitor must contact [admin@harmonybc.co.uk](mailto:admin@harmonybc.co.uk). Harmony clarifies to the visitor whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

## **12. Existence of automated decision-making**

As a responsible company, we do not use automatic decision-making or profiling.

Reference: RSGDPR1563544536