

Hadley Group Privacy Notice

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1. Introduction

Hadley Industries Holdings Limited and its group companies are committed to protecting the privacy and security of personal data. This Privacy Notice explains how we collect, use, store, share and protect personal data when individuals interact with Hadley Group, including through our websites, business enquiries, customer and supplier relationships, recruitment activity, marketing communications, events, digital platforms and business development activity.

Hadley Industries Holdings Limited is the data controller for the personal data described in this notice unless otherwise stated. This means we are responsible for deciding how and why personal data is used. For the purposes of this Privacy Notice, "Hadley Group", "we", "us" or "our" means Hadley Industries Holdings Limited and its relevant subsidiaries and business units.

2. Scope of this Privacy Notice

This Privacy Notice applies to personal data collected and used in connection with:

- Visits to Hadley Group websites
- Enquiries, quotations and requests for information
- Customer, supplier and business relationships
- Software access and technical support
- Marketing and business communications
- Events, exhibitions and webinars
- Recruitment and job applications
- Business development and prospecting activity
- CRM and data management systems
- Digital tools, analytics and automation
- Other interactions with Hadley Group

Hadley Group operates through a number of business units and subsidiaries in the UK and internationally. Where appropriate, personal data may be shared within Hadley Group for

legitimate business purposes, including customer service, technical support, sales, marketing, operational delivery, compliance, reporting and business administration.

3. What is personal data?

Personal data means any information that identifies, or could reasonably identify, an individual. This may include information such as a person's name, business email address, job title, telephone number, online identifier, employment details, contact history or other information linked to that individual. Personal data can apply in a business context where a named individual is acting on behalf of an organisation.

4. What personal data we collect

Depending on how you interact with us, we may collect and process the following categories of personal data:

- Name
- Job title
- Company name
- Business address
- Business email address
- Telephone number
- Enquiry details
- Product or service interests
- Project requirements
- Quotation or order information
- Correspondence and communication history
- Marketing preferences
- Event attendance or registration information
- CRM records and business relationship information
- Website usage information
- IP address, device information, browser type and cookie preferences
- Recruitment information, including CVs, covering letters, employment history, qualifications and references
- Information available from public business sources or third-party business data providers, where relevant to our business-to-business activities

We aim to collect only the personal data that is necessary, relevant and proportionate for the purpose for which it is used.

5. Personal data collected through our websites

When you use our websites, we may collect personal data where:

- You submit a general enquiry
- You request a quotation
- You ask us to contact you
- You request product or technical information
- You download software or technical resources
- You sign up to receive marketing communications
- You register for events or webinars
- You apply for a vacancy
- You use website forms or interactive features

We may also collect technical and usage information through cookies and similar technologies. This may include information about your device, browser, IP address, pages visited, referral URL, date and time of visit, and how you interact with our website. Further information is provided in the cookies section below.

6. Information we collect from other sources

In some circumstances, we may collect business contact information from sources other than directly from you. This may include:

- Publicly available company websites
- Public professional profiles
- Business directories
- Industry platforms and publications
- Event attendee or registration lists, where lawfully available
- Third-party business data providers
- Existing customer, supplier or project databases
- Construction, specification or market intelligence platforms
- Publicly available project or procurement information

We may use this information to identify appropriate business contacts, understand potential customer requirements, support account management, respond to enquiries, develop business relationships and promote relevant Hadley products or services. We will only use this information where we have a lawful basis to do so and where the use is relevant, proportionate and appropriate in a business-to-business context. We do not knowingly use sensitive personal data for marketing or prospecting purposes.

7. Use of AI, automation and profiling

Hadley Group may use digital tools, automation and artificial intelligence-supported systems to help us manage data, improve business processes, understand customer needs and support sales and marketing activity. This may include using technology to:

- Analyse business information and market signals
- Identify organisations or contacts that may have a relevant business need
- Segment contacts by sector, role, geography or area of interest
- Support lead prioritisation and account planning
- Assist in preparing relevant communications
- Improve the quality and consistency of customer and prospect engagement
- Improve internal reporting and operational efficiency

Where we use AI or automated tools, we aim to ensure the processing is fair, proportionate and subject to appropriate human oversight. Hadley Group does not intend to make legally significant decisions about individuals solely by automated means. Where automated tools support business decisions, human review and appropriate governance controls will be applied. You have the right to object to the use of your personal data for direct marketing. This includes profiling related to direct marketing.

8. Why we use personal data

We may use personal data for the following purposes:

- Respond to enquiries, requests for information or requests for quotations;
- Provide products, services, technical support or software access;
- Manage customer, supplier and business relationships;
- Process job applications and recruitment activity;
- Maintain records in our CRM and business systems;
- Send relevant business communications, where permitted by law;
- Manage event invitations, attendance and follow-up;
- Understand website usage and improve our digital platforms;
- Identify relevant business opportunities and support sales development;
- Analyse market trends, sectors and potential customer requirements;
- Provide product updates, technical updates and company information;
- Prevent fraud, protect our systems and maintain information security;
- Comply with legal, regulatory, contractual, tax, accounting or reporting obligations.

We will only use personal data where we have a lawful basis to do so.

9. Our lawful basis for using personal data

Under data protection law, we must have a lawful basis for using personal data. Depending on the activity, we may rely on one or more of the following lawful bases:

Lawful basis	How this may apply
Contract	Where we need to use personal data to provide quotations, products, services, technical support or contractual communications.
Legal obligation	Where we need to comply with legal, regulatory, tax, accounting, employment or reporting requirements.
Consent	Where you have actively agreed to receive specific communications, such as certain marketing updates or newsletters.
Legitimate interests	Where we have a fair and reasonable business reason to use personal data, provided this does not override your rights and freedoms.

Our legitimate interests may include:

- Responding to business enquiries
- Managing customer and supplier relationships
- Maintaining CRM and business records
- Promoting relevant Hadley products and services to business contacts
- Identifying appropriate business contacts and market opportunities
- Improving our websites, services and communications
- Supporting sales development and account management
- Protecting our systems, data and business operations
- Preventing fraud or misuse of our services

Where we rely on legitimate interests for direct marketing or business development activity, we will consider whether the use of personal data is necessary, proportionate and within reasonable expectations. You can object to direct marketing at any time.

10. Marketing and business communications

We may send marketing and business communications to individuals and organisations where permitted by law. This may include product updates, technical information, event invitations, company news, service updates, case studies, sector insights, business unit updates and relevant information about Hadley products and services.

We may send communications where you have given consent, you have requested information from us, you are an existing customer, supplier or business contact, or we have a legitimate interest in contacting you about relevant Hadley products or services in a business-to-business

context. All marketing communications will identify Hadley Group or the relevant Hadley business unit.

We will provide a clear way to opt out of marketing communications, and you can object to direct marketing at any time by contacting data.protection@hadleygroup.com. Where appropriate, you may also use the unsubscribe or opt-out method included in the communication. We will maintain suppression records to ensure opt-out requests are respected.

11. Business development and prospecting

As part of our business-to-business activity, Hadley Group may process limited business contact information to identify and engage relevant organisations and professional contacts who may have a legitimate business interest in our products, services, technical expertise or project support. This may include using business contact details, company information, sector information, role and responsibility information, project or market intelligence, previous engagement with Hadley Group, publicly available business information and information from approved third-party business data providers.

We use this information to improve the relevance of our communications and to avoid broad, untargeted marketing wherever possible. Hadley Group does not use sensitive personal data for prospecting purposes. Individuals can object to direct marketing at any time.

12. Cookies and website tracking

Our websites use cookies and similar technologies to operate effectively, improve performance, understand visitor behaviour and, where applicable, support marketing activity. Cookies are small text files placed on your device when you visit a website. We may use the following categories of cookies:

Cookie type	Purpose
Strictly necessary cookies	Required for the website to function properly and cannot usually be switched off.
Security cookies	Help protect the website and forms from misuse or unauthorised activity.
Analytics / performance cookies	Help us understand how visitors use our websites so we can improve content, structure and performance.
Marketing cookies	May be used to understand engagement with our content or support relevant marketing activity, where enabled.

Non-essential cookies will only be used where appropriate consent has been obtained through our cookie banner or preference settings. You can manage your cookie preferences through the website cookie settings or through your browser settings. Blocking some cookies may affect how

the website functions. Our cookie notice should be read alongside this Privacy Notice and should reflect the actual cookies and tracking technologies used across Hadley Group websites.

Further information about the cookies and tracking technologies used across Hadley Group websites can be found in our Cookie Policy.

13. Google Analytics and website analytics

We may use analytics tools, such as Google Analytics or equivalent technologies, to understand how visitors use our websites and to improve the performance, content and usability of our digital platforms. Analytics tools may collect information such as pages visited, time spent on pages, browser and device type, approximate location, referral source, IP address or online identifiers, and interactions with website content. Where required, analytics cookies will only be used with your consent. Analytics data may be aggregated or anonymised where possible.

14. Recruitment data

Where you apply for a job with Hadley Group, we may collect and use personal data to manage the recruitment process. This may include name and contact details, CV and covering letter, employment history, education and qualifications, references, interview notes, right-to-work information and role suitability information. We will use recruitment data to assess your application, communicate with you, conduct interviews, complete recruitment checks and comply with legal obligations. Recruitment data will be kept separate from sales and marketing datasets and will not be used for marketing purposes.

15. Who we share personal data with

We may share personal data with trusted third parties where necessary for legitimate business, operational, legal or service delivery purposes. This may include:

- Hadley Group companies and business units;
- CRM and business system providers;
- Website hosting, development and maintenance providers;
- IT, cyber security and cloud service providers;
- Email, marketing and event management platforms;
- Analytics and reporting providers;
- Recruitment platforms or recruitment service providers;
- Professional advisers, including legal, audit, tax and insurance advisers;
- Payment providers, where applicable;
- Logistics, fulfilment or customer support providers;
- Business data providers, where used lawfully;

- Regulators, government bodies or law enforcement agencies where required.

Where third parties process personal data on our behalf, we require them to protect it, use it only for agreed purposes and act in accordance with applicable data protection laws. We do not sell personal data.

16. Group data sharing

Hadley Group operates through different companies, business units and locations. Where appropriate, personal data may be shared within Hadley Group for purposes such as responding to enquiries, managing customer or supplier relationships, providing technical or product support, managing projects, sales and marketing coordination, CRM management, reporting and business administration, compliance, legal and risk management, and IT and system support. Internal data sharing will be limited to what is necessary for the relevant business purpose. Access to personal data will be restricted to authorised personnel who need it for their role.

17. International data transfers

Hadley Group operates internationally and may need to share personal data with group companies, suppliers or service providers located outside the UK or European Economic Area. Where personal data is transferred internationally, we will take steps to ensure appropriate safeguards are in place. These may include transfers to countries recognised as providing adequate protection, standard contractual clauses or equivalent safeguards, data processing agreements with appropriate security and confidentiality obligations, and internal controls governing access, storage and use of personal data. We will only transfer personal data internationally where there is a lawful basis and appropriate protection for the data.

18. How long we keep personal data

We will only keep personal data for as long as necessary for the purpose for which it was collected, including to meet legal, accounting, reporting, contractual, operational or legitimate business requirements. Retention periods may vary depending on the type of data and the reason it is held. Indicative retention principles include:

Data type	Retention approach
Enquiry data	Retained for as long as needed to respond to the enquiry and manage any resulting business relationship.
Customer and supplier records	Retained for the duration of the relationship and for any required legal, contractual, tax or accounting period.

Prospect and business development data	Reviewed periodically and deleted, anonymised or refreshed when no longer relevant.
Marketing contact data	Retained until you unsubscribe, object, withdraw consent, or the data is no longer relevant.
Suppression records	Retained as necessary to ensure we do not contact individuals who have opted out.
Recruitment data	Retained for the recruitment process and any applicable legal or business requirement.
Website analytics data	Retained in line with our analytics and cookie settings.

Where data is no longer required, we will securely delete, anonymise or archive it in line with our internal retention procedures.

19. How we protect personal data

We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, alteration or disclosure. These measures may include access controls, secure systems and password protections, encryption where appropriate, supplier due diligence, staff training and internal policies, data minimisation and retention controls, monitoring and security processes, and incident response procedures. Access to personal data is limited to those who need it for legitimate business purposes.

20. Your rights

Under data protection law, you have rights in relation to your personal data. These may include the right to:

- Request access to the personal data we hold about you
- Request correction of inaccurate or incomplete data
- Request deletion of your personal data in certain circumstances
- Object to processing based on legitimate interests
- Object to direct marketing at any time
- Object to profiling related to direct marketing
- Request restriction of processing
- Request transfer of your personal data to another party, where applicable
- Withdraw consent where processing is based on consent
- Raise a complaint with the Information Commissioner's Office

If you object to direct marketing, we will stop using your personal data for that purpose. To exercise your rights, please contact data.protection@hadleygroup.com. We may need to verify

your identity before responding to your request.

21. Your right to object to direct marketing and profiling

You have an absolute right to object to the use of your personal data for direct marketing. This includes any profiling related to direct marketing. If you object, we will stop using your personal data for direct marketing purposes. We may retain limited information on a suppression list to ensure we do not contact you again for marketing purposes.

22. Identity verification

Where you make a request in relation to your personal data, we may need to verify your identity before responding. This helps us protect personal data and ensure we only disclose information to the correct person. We may request reasonable proof of identity, such as photo identification, proof of address or other appropriate verification information.

23. Complaints and concerns

If you have any questions or concerns about how Hadley Group uses your personal data, please contact us first so that we can investigate and respond. You can contact us at data.protection@hadleygroup.com or by post at Hadley Industries Holdings Limited - Data Protection Contact, PO Box 92, Downing Street, Smethwick, West Midlands, B66 2PA. You also have the right to raise a concern with the UK Information Commissioner's Office.

24. Data protection by design

Hadley Group aims to consider privacy and data protection requirements when introducing new systems, processes, digital tools or marketing activities. Where a new activity may present higher privacy risks, we may complete appropriate assessments, such as data processing reviews, legitimate interest assessments, data protection impact assessments, supplier due diligence, security reviews, and policy and process updates. This helps ensure that personal data is used responsibly, proportionately and transparently.

25. Suppliers, systems and due diligence

Where we use third-party suppliers, platforms or technology providers to process personal data, we will take steps to ensure those providers are appropriate for the intended purpose. This may include reviewing data processing terms, information security measures, hosting locations, international transfer arrangements, data retention and deletion processes, access controls, use

of subcontractors, whether data is used for the supplier's own purposes, and whether AI tools use submitted data to train models. Suppliers who process personal data on our behalf must only do so in accordance with our instructions and applicable data protection requirements.

26. Data accuracy

We take reasonable steps to ensure personal data is accurate and up to date. Where personal data is used for business development, CRM management or marketing purposes, we may periodically review, refresh, update, delete or anonymise records. If you believe the personal data we hold about you is inaccurate or incomplete, you can ask us to correct it by contacting data.protection@hadleygroup.com.

27. Data minimisation

Hadley Group aims to collect and use only the personal data that is necessary for the relevant purpose. For business development and marketing activity, this means we will aim to limit data to relevant business information, such as professional role, company, contact details and business relevance. We do not knowingly use sensitive personal data for marketing or prospecting.

28. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our business, websites, legal obligations, technology, data use or regulatory requirements. The latest version will be published on our website and will show the date it was last updated.

Last updated: [26/05/2026]