

Privacy Policy

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INTRODUCTION

Welcome to IEH Corporation's ("IEH") privacy policy.

IEH respects your privacy and is committed to protecting your personal information. This privacy policy will inform you as to how we look after your personal information when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how IEH collects and processes your personal information through your use of the website <https://www.iehcorp.com> and its subdomains (collectively, the “Website”), including any information you may provide through the Website when you fill out one of our request forms, purchase one of our products, or apply for employment with us.

This website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on this Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or on or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us by sending an email to ieh@iehcorp.com.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This privacy policy supplements other notices and privacy policies and is not intended to override them.

CONTROLLER

IEH Corporation is the controller and responsible for your personal information (collectively referred to as IEH, “we”, “us” or “our” in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your rights in connection with personal information we hold about you, please contact us by sending us an email at ieh@iehcorp.com.

If you are based in the European Union you also have the right to make a complaint at any time to the national supervisory authority for data protection issues in the country in which you reside. We would, however, appreciate the chance to deal with your concerns before you approach the regulator so please contact us at the above contact information in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was first published on October 8, 2018.

We reserve the right to change the terms of this Privacy Policy at any time. When we do, we will post the revised Privacy Policy to our Website and the last revision date of revision will be updated so that you will always be able to understand what information about you we collect, how we use your information, and under what circumstances we may share your information with others. We will notify you of any material changes by way of a pop-up notice on the Website announcing that the Privacy Policy has changed, and pointing the changes to your attention.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

THIRD-PARTY LINKS

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

[Please note that we also do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. If you are based in the United States you can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website at <http://optout.networkadvertising.org>. If you are based in the European Union you may visit the website of the European Interactive Digital Advertising Alliance ("EIDAA") at <https://www.edaa.eu> as well as of the European Advertising Standards Alliance ("EASA") at <http://www.easa-alliance.org>.]

2. THE INFORMATION WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, and company/organization name.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us.
- **Technical Data** includes your internet protocol (IP) address, your mobile device's unique ID number, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
- **Usage Data** includes information about how you use our Website, [services], such as the buttons, controls, products, pages of our Website that you visit, the time spent on those pages, your search queries for a Mil-Spec or IEH Part number, the dates and times of your visits, but also about the webpage you were visiting before you came to our Website and the webpage[s] you go to next.
- **Marketing Data** includes your preferences in receiving marketing from us and our third parties.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information but is not considered personal information in law as this information does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products you have ordered. In this case, we may have to cancel a product you have ordered from us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect information from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - fill out our inquiry Request Form;
 - fill out our CAD Request Form;
 - purchase one of our products;
 - request marketing to be sent to you;
 - complete our Employment Application Form; or
 - give us some feedback
 - **Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.
 - **Third parties.** We may receive personal information about you from various third parties as set out below:
 - Technical Data from analytics providers such as Google based outside the EU;
 - Identity, Contact, and Financial Data from our independent network of sales representatives, the list of which can be found on our Website at <https://www.iehcorp.com/contact/international>
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4. HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you for the purchase of goods we offer for sale through our Website.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal information.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to setting certain types of cookies to enable you to access our Website or where otherwise indicated in connection with any purpose-specific privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us by email at ieh@iehcorp.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To respond to your inquiries	(a) Identity (b) Contact	Necessary for our legitimate interests (to respond to customer requests)
To process and deliver requested CADs	(a) Identity (b) Contact	Performance of a contract with you
To process employment applications	(a) Identity (b) Contact	Necessary in order to take steps at your request prior to entering into a contract
To process and deliver your order including: (a) Manage payments, fees and charges (b) collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (to recover payments due to us under a contract) (b) Necessary for our legitimate interests (when we have to start legal proceedings to recover debts due to us)
To manage our relationship with you, which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact	Necessary for our legitimate interests (to keep you updated on the terms that apply to our business relationship)
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and/or services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about products and/or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing	Necessary for our legitimate interests (to develop our products and/or services offerings and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and offers may be relevant for you.

If you are based in the European Union, you will receive marketing communications from us if you have requested information from us or purchased products from us and you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting us by email at ieh@iehc corp.com at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, product experience or other transactions.

CALIFORNIA RESIDENTS: YOUR PRIVACY RIGHTS

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to ieh@iehcorp.com.

DO NOT TRACK “DNT” SIGNALS

While we take all reasonable steps to protect the privacy of our Website visitors, we cannot promise that the current limitations of our online applications programming will address every browser setting or honor every personal browser preference. In particular, we have not implemented the necessary program changes to honor “Do Not Track” or “DNT” browser signals. As our online applications programming is refined, we will take all reasonable steps to honor such requests in the future. Please return to this Privacy Policy for further updates on this topic.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [our cookie policy](#).

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL INFORMATION

We may have to share your personal information with the parties set out below for the purposes set out in the table above.

- Third Parties as set out in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

Please contact us by email at ieh@iehcorp.com if you want further information on the specific third party recipients with whom we may share your personal information and the purpose(s) for such sharing.

6. INTERNATIONAL TRANSFERS

We share your personal information within our company. This will involve, if you are a resident of the European Union, transferring your information outside the European Economic Area (EEA).

Many of our external third party recipients are also based outside the EEA so their processing of your personal data will also involve a transfer of information outside the EEA.

If you are based in the European Union, whenever we transfer your personal information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the U.S., we may transfer information to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between Europe and the U.S. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us by email at ieh@iehcorp.com if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.

7. INFORMATION SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

For more information about the security measures we have implemented to protect your personal information, please contact us by email at ieh@iehc corp.com.

8. INFORMATION RETENTION

HOW LONG WILL YOU USE MY PERSONAL INFORMATION FOR?

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal information are available in our retention policy which you can request from us by contacting us by email at ieh@iehc corp.com.

In some circumstances you can ask us to delete your information: see [Request erasure](#) below for further information.

In some circumstances we will anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION WE HOLD ABOUT YOU

Under certain circumstances, you have rights under data protection laws in relation to your personal information. Please click on the links below to find out more about these rights:

- [Request access to your personal information.](#)
- [Request correction of your personal information.](#)
- [Request erasure of your personal information.](#)
- [Object to processing of your personal information.](#)
- [Request restriction of processing your personal information.](#)
- [Request transfer of your personal information.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact us by email at ieh@iehc corp.com.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and/or product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your information where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal information where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

- Service providers acting as processors based in the United States who provide IT and system administration services, email services, and server hosting services.
- Professional advisers, including lawyers, bankers, auditors and insurers based in the United States who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities based in the United States who require reporting of processing activities in certain circumstances.
- Independent Sales Contacts acting as processors providing sales fulfillment services.

YOUR RIGHTS IN RELATION TO INFORMATION WE HOLD ABOUT YOU

You have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios:

- If you want us to establish the information's accuracy.
- Where our use of the information is unlawful but you do not want us to erase it.
- Where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products and/or services to you. We will advise you if this is the case at the time you withdraw your consent.