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PRIVACY POLICY

FOR CUSTOMERS/SUPPLIERS



Privacy Policy

for Customers/Suppliers

1. The purpose of this document

EffecTech's commercial activities are entirely business-to-business so we gather, store and process minimal personal information concerning the staff members of our customers, prospective customers, suppliers and business partners.

This Privacy Policy will help you understand what personal data we collect, why we collect it, what we do with it and for how long it will usually be retained. It applies to all of our business activities, whenever we collect personal data.

EffecTech Limited ("EffecTech", "We") is a Data Controller. This means that we are responsible for deciding how we hold and use personal information about you.

We have a Data Protection Manager (DPM) who is responsible for compliance with this policy and for actioning any requests you may have concerning your data. You may write to EffecTech's DPM in writing to DPM, EffecTech Limited, Dove House, Dove Fields, Uttoxeter ST14 8HU, United Kingdom or by emailing *privacy@effectech.co.uk*.

This document provides you with certain information that we must be provided under the General Data Protection Regulation (GDPR).

2. Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. The information we hold about you

In the course of our relationship, EffecTech collects and stores contact information for customers and suppliers some of which is personal information about you. This information is in the following categories:

- **Personal and contact details** including full names, job titles, workplace emails addresses, telephone numbers and postal addresses and our contact history.
- **Marketing and data analysis** including history of our communications, information about our products and services we think may be of interest to you and data analysis to help target products, services or information you may find useful.

4. How your personal information is collected

We collect personal information about customers and suppliers by the use of email, telephone, face-toface meetings, via the website contact form or through subscription to the EffecTech newsletter.

This personal information is from the following sources:

- You.
- Information generated about you when you use our products and services.
- Referrals from our business partners / agents / distributors.
- Social media, internet, news articles, scientific meetings / conferences and scientific publications.

5. How we use personal information about you

We will use the personal information we collect about you for the following purposes:

- Maintaining our records.
- Managing the products and services we supply.
- Managing and operating our business processes.
- To keep records of communications between us.
- To fulfil our contractual obligations to you.
- Market research and analysis.
- Direct marketing of products and services which we think may be of interest to you via telephone, email, post and social media. These include customer feedback surveys, brochures and leaflets, regular digital newsletters and updates on new products and services we offer.

6. Legal grounds for processing your personal information

Where we have a legitimate interest and for you to obtain the greatest benefit from our products, services and business relationship including:

- All stages and activities relevant to the delivery of products and services, from initial enquiry, assessment of suitability for intended purpose, quotation, order processing, fulfilment, dispatch, administration and management of accounts and collection of invoiced sums due.
- To perform, manage, test and improve the performance of our products, services and internal processes.
- To follow guidance and recommended best practice of government and regulatory bodies.
- For market research, analysis and statistical evaluation.
- For direct marketing and sales.
- Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations.
- Presentations, posters and other technical literature.
- For historical purposes
- The delivery of technical support services.
- Updating your records.

• Sharing your personal information with business partners to assist in the delivery and management of the products and services your organisation has purchased.

7. Data sharing

EffecTech shares your personal data internally for the purposes of executing our obligations to you under the terms of our contractual relationship or for other legitimate business interests.

EffecTech does not share your personal data with third parties except in the following circumstances:

- To pass your contact details to EffecTech's sister office in India, EffecTech Gases Pvt Ltd, when appropriate, so that they can deal with your enquiries. For more information about EffecTech, India, see <u>https://www.effectech.co.uk/about-effectech/india/</u>
- To pass your contact details to EffecTech's agents and distributors when appropriate, so that they can deal with your enquiries. For more information about EffecTech's list of agents and distributors, see <u>https://www.effectech.co.uk/about-effectech/contact-information/overseasagents-and-distributors/</u>
- Should you sign up to receive EffecTech's newsletter then we will pass your name and email address to a third party Data Processing company for the sole purpose of distributing the newsletter.

8. Right to withdraw consent

If you no longer wish to receive direct marketing communications you can simply opt out by contacting us at *privacy@effectech.co.uk*.

If you currently receive the newsletter but no longer wish to do so, you can unsubscribe by clicking the link at the bottom of the newsletter or by contacting us at *privacy@effectech.co.uk*

Once we have received notification that you have withdrawn your consent, subject to our retention policy, we will dispose of your personal data securely.

9. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. Automated decision-making

We will not make decisions based solely on automated decision making that have significant impact on you.

11. Data retention

We will continue to retain your personal information providing:

- You remain an appropriate contact to enable EffecTech to exercise its obligations to you under the terms of our contractual relationship.
- You remain an appropriate contact for EffecTech to continue managing its relationship with you for legitimate business interests.
- You have not withdrawn consent to receive direct marketing communications or newsletters by email, post or telephone.

If none of the above apply then we will securely destroy your personal information in accordance with our data retention policy and with due consideration of legal and regulatory requirements or guidance on retention.

12. Rights of access, correction, erasure, and restriction

Under certain circumstances, by law 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.
- **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 exercised your right to object to processing.
- **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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact EffecTech in writing using the email <u>privacy@effectech.co.uk</u>.

You also have the right to complain to the Information Commissioner's Office which enforces data protection laws: <u>https://ico.org.uk/</u>.