1. Overview

The following outlines the Vulcan Fasteners privacy policy in compliance with the Data Protection Act 1998 (DPA) and the General Data Protection Regulation (GDPR) (EU Regulation 2016/679).

Your privacy is important and we respect and value the privacy of all of our customers and website visitors and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it in so far as how we collect, store, use and access data.

2. Personal Data

The policy ensures good practice in data handling and the protection of business and personal information. Data is processed fairly and lawfully and covers the implications for staff, customers and suppliers.

Under GDPR personal data is defined as information that can be used to identify someone, directly or indirectly. This includes your name, contact details, and photographs. Indirectly, personal data may also include identification numbers, electronic location data, and IP address, online cookies and location data.

3. What personal data do we collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- First and last name
- Contact information such as address, postcode, email addresses and telephone numbers
- Business/company name
- Details of your interactions with us, such as with customer support, or previous purchases
- Job title
- Profession
- Details of your visits to our websites and which site referred you
- System properties
- Payment information

We collect this information when you make an enquiry about our products and services, sign up to our newsletter, fill out forms, register to use our services, create an account with us or engage with us on social media.

Additionally, we may collect additional non-personal information by automatic means when you visit our site. Examples are these are IP address, browser type and operating system, referring URLs, your use of our website and referral information. We collect this information automatically through the use of various technologies, such as cookies.

In the case of Cookies, please review to our Cookie Policy.

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

Personal data of children

Our website and services are targeted at persons over the age of 16 years. If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

4. How and why do you use my personal data?

Under the GDPR, we must have a lawful basis for using personal data. This may be because the data is necessary for our fulfillment of a contract with you, because you have given consent to us to use your personal data, or so we can give you the best possible customer experience.

Your personal data may be used for one of the following purposes:

- a) Supplying products and services to you
- b) Personalising and tailoring products and services so we can ensure that we are providing products and services to suit our customers' needs
- c) To provide ongoing customer support to you, such as new products, discontinued lines, delivery options and updates. It also enables us to respond to your questions and complaints
- d) To provide you with communication and marketing materials that you have expressed an interest in receiving such as breakfast mornings, product special offers and our activities. We will keep you informed by email and you can withdraw

your consent at any time by unsubscribing from the emails or contacting <u>us here</u>.

- e) Analysing your use of our website and gathering feedback to enable continual improvements to our website and your user experience with the products and services we provide
- f) To maintain the integrity of our website as well as resolve any problems that may occur during and after your use of our sites
- g) For recruitment purposes, when you apply for an open position
- h) To create and administer records about any account you create with us to use our services
- i) To process payments and prevent fraudulent transactions to help protect our customers from fraud
- j) To send you communications required by law or which are necessary to update you to changes to the products and services we provide such as updates to our Terms of Service, Terms of Use or Privacy Policy
- k) To comply with our contractual or legal obligations to share data with law enforcement

5. How do you protect my personal data?

We implement various security measures and take all appropriate steps in order to protect the personal data you share with us. These measures include but are not limited to:

- File encryption on all database servers with restricted file access
- Two factor authentication (TFA) on all critical services
- Data encryption between services within our systems and provided by third parties

Security measures are frequently reviewed and updates or additional measures implemented wherever necessary to continue to increase our security.

6. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. At the end of that retention period, your data will either be completely deleted or anonymised, such as by aggregating data together so it can be utilised in a non-identifiable way for statistical analysis and business planning.

For example, we may retain your personal information for the length of your warranty period, so we can comply with our legal and contractual obligations to you.

7. How is my data stored or transferred?

Sometimes we need to share your personal data with third parties and suppliers. Some of these companies may be outside the European Economic Area (EEA) (the 'EEA' consists of all EU members states, plus Norway, Iceland and Liechtenstein), such as the USA.

All personal data is stored electronically in secure online storage or password-protected systems. All paperwork containing sensitive data is stored in a locked cupboard, accessible only by key staff members.

Any personal data transferred is treated as safely and securely as it would be within the EU and under GDPR using an encrypted email or messenger service.

8. Do you share my personal data?

We may sometimes share your personal data with third parties who facilitate us in providing our products and services to you. We restrict the information shared to only the Personal Information required for them to fulfil their services to us. These companies can include:

- a) IT companies who support our website, our applications and other business systems
- b) Operational companies, such as delivery couriers
- c) Web analytics companies such as Google and Facebook who help us to improve our website
- d) Direct marketing companies, for example Mailchimp, that enable us to manage our electronic communications
- e) If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

9. How to access the personal data we hold for you

You have the right to access the data we hold for you. Your principal rights under data protection law are the right to:

- a) Access
- b) Rectification
- c) Erasure
- d) Restrict processing
- e) Object to processing
- f) Data portability
- g) Complain to a supervisory authority
- h) Withdraw consent

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it. This is known as a "subject access request".

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

Any access requests will be fulfilled within 30 days. We have the right to refuse access with full written details as to why within 30-days and you have the right to complain against such a refusal.

10. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website.

This notice was last updated on 30/05/2018.

11. Contact details

Vulcan Industrial Fasteners Limited

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