



ARMOLLOY (U.K.) LTD.

Mammoth Drive, Wolverhampton Science Park,
Wolverhampton, WV10 9TF, England
Tel: +44 (0) 1902 310375 Fax: +44 (0) 1902 310075
e-mail: jillian.h@armolloy.co.uk
web: www.armolloy.co.uk

Privacy Policy

INTRODUCTION

This Privacy Policy explains what we do with your personal data, whether we are in the process of providing you with a quotation, processing an order, responding to an enquiry or in other ways improving and continuing our relationship with you and your company, providing you with a service, receiving a service from you, or you are visiting our website.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

Who are we and what do we do?

We are a UK registered business offering a Coating Service to customers within the EU and other areas of the World. Within this policy Armolloy (UK) ltd will be referred as (*us, we, the company or our business*).

We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective customer contact details;
- Prospective and live client contacts;
- Supplier contacts to support our services;
- Employees, consultants, temporary workers for further information see our GDPR privacy notice for staff;

– Website users

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”), your rights under the GDPR are set out in this notice but will only become law on 25th May 2018.

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

Information you give to us or we collect about you.

This is information about you that you give us by filling in forms on our site www.armolloy.co.uk or by corresponding with us by phone, e-mail or otherwise.

It includes information you provide when you register to use our site, subscribe to our services, attend our events, request a quotation for our coating service; enter a survey, and when you report a problem with our site. This may include: _

- Your personal details, including your name, your business address, email addresses, phone numbers and title.
- You will be given an account number which identifies your customer account and used by us.
- Trading names, including proof of trading address and sales information will also be captured.
- CCTV images of you may be captured on our premises.

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Privacy Policy continued

Information you give to us or we collect about you. Continued:

- Where applicable we are required to collect additional information for those in Scotland.
- financial information,
- compliance documentation and references,
- links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, or corporate website.

Information we collect about you when you visit our website.

With regard to each of your visits to our site we will automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time),
- pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs).

Information we obtain from other sources.

This is information we obtain about you from other sources such as:

- LinkedIn,
- corporate websites,
- your business card, personal recommendations or other referrals that we may receive about you.
- In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and
- for what purpose we intend to retain and process your personal data.
- Companies House, Credit rating companies and other financial organisations.

We are working closely with third parties including business partners, sub-contractors in technical, professional and other services, advertising networks, analytics providers, search information providers, credit reference agencies, and professional advisors. We may receive information about you from them for the purposes of our coating services and ancillary support services.

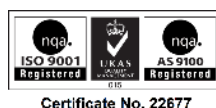
Purposes of the processing and the legal basis for the processing

We use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information and services that you request from us or we think will be of interest to you because it is relevant to you or to your organisation.

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Privacy Policy continued

Purposes of the processing and the legal basis for the processing continued:

We use information held about you in the following ways continued:

To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contracts with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required.

To ensure that our quality system, customer quotation and order system and supplier control systems are up to date and correct.

Our Legitimate Business Interests

Our legitimate interests in collecting and retaining your personal data is described below:

In order to support our business we require a database of client and supplier personal data containing historical information as well as current coating requirements.

To maintain, expand and develop our business we need to record the personal data of prospective clients.

To maintain our Quality Management System and our Financial Management system.

Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record this (your response) on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Other Uses we will make of your data:

- Use of our website;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

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Privacy Policy continued

We will use this information:

- to administer our site and for internal operations, including Quality system control, Supplier evaluation, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising and or marketing information to you;
- to make suggestions and recommendations to you and other users of our site about services that may interest you or them
- Manage the supplier or client account you hold with us;
- Process your orders and refunds;
- Deliver goods to your premises;
- Communicate with you about your account or the services required;
- Produce invoices and statements and make them available on line for you;
- Consider any application for credit;
- Maintain your credit account;
- Maintain supplier accounts
- Communicate with you in emergencies or in relation to a product recall;
- As evidence of identity for high cash transactions and for the granting of credit;
- Review your purchase history
- CCTV images are obtained to ensure security and safety; and
- Control of our Quality management system and Supplier Evaluation

We need to process your personal data so that we can manage your customer or supplier accounts, provide you with the goods and services you want to buy and to help you with any orders and refunds you may request.

In relation to suppliers: processing your data in this way is necessary to enable us to fulfil our obligations to you as your customer.

We will also use your data to:

Manage and improve our websites and deliveries for example:-

Data is used to help develop and improve our services, information technology systems, know-how and the way we communicate with you.

We rely on the use of personal data to carry out internal and external market research which enables us to serve you better as a customer.

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Privacy Policy continued

Detect and prevent fraud or other crime.

We have an obligation to ensure that our Services are safe and consequently, if required your data may be processed in order to detect and prevent fraud, other crimes and the misuse of our Services. This helps us to make sure that you can safely use our Services.

Personalise your customer experience

On our website we may also use your online browsing behaviour to help us better understand you as a customer and provide you with a personalised service.

Personalise your customer experience continued:

Looking at your browsing behaviour and purchases allows us to personalise our service for you – such as allowing us to personalise communications to your business type. This helps us meet your needs as a customer.

We can then provide you with relevant marketing communications (including by email, phone, post and text where permitted), relating to services, and those of our suppliers and third parties. We may also measure the effectiveness of our marketing communications.

We want to ensure that we provide you with marketing communications, including online advertising, that are relevant to your business needs.

Changing your preferences

You can state your marketing preferences when you register with us as a customer and can change these at any time after that by notifying us either by telephone or by unsubscribing to an email.

Where applicable you also have choices when it comes to online advertising. We set out below your choices when it comes to cookies, and how you can control your online behavioural advertising preferences.

Contact and interact with you

We may contact you about our Services, for example by phone, email, text or post or by responding a request you have directed at us. We may also contact and interact with you as a supplier for example via phone, email, text or post in relation to the services you provide to us as a company.

We want to serve you better as a customer, so we use personal data to provide clarification or assistance in response to your communications and to respond to your queries.

Invite you to take part in and manage customer surveys, questionnaires and other market research.

We'd like to involve you in activities carried out by the company, and by other organisations on our behalf.

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Privacy Policy continued

Invite you to take part in and manage customer surveys, questionnaires and other market research.
Continued:-

Why do we process your personal data in this way? We carry out market research to improve our Services. However, if we contact you about this, you do not have to take part in the activities. If you tell us that you do not want us to contact you for market research, we will respect this choice.

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

When you contact us or we contact you or you take part in promotions, surveys or questionnaires about our Services, we may collect:-

- Personal data you provide about yourself anytime you contact us about our Services including by phone, email or post or when you speak with us where applicable through social media
- Details of the emails and other digital communications we send to you that you open, including any links in them that you click on
- Your feedback and contributions to customer surveys and questionnaires

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

For detailed information on the cookies we use and the purposes for which we use them.

In addition to the above, if you visit our Website we may collect: continued

- information about your online browsing behaviour on our Website and information about when you click on one of our adverts (including those shown on other organisations' website)
- Information about any devices you have used to access our Services (including the make, model and operating system, IP address, browser type and mobile device identifiers); and
- Location information based on IP address and language.

Marketing and Market Research

This section explains the choices you have when it comes to receiving marketing communications and taking part in market research.

We will send you news about our services in a number of ways including by email, but only if you have previously agreed to receive these marketing communications. When you register with us we will ask if you would like to receive marketing communications, and you can change your marketing choices online, in branch, over the phone or in writing at any time.

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Privacy Policy continued

Marketing and Market Research continued

We also like to hear your views to help us to improve our Services, so we may contact you for market research purposes. You always have the choice about whether to take part in our market research.

Improve the way our Website work

Cookies allow us to improve the way our Website works so that we can personalise your experience and allow you to use many of their useful features.

For example, we use Cookies so we can remember your preferences and the contents of your shopping basket when you return to our Website.

Improve the performance of our Websites

Cookies can help us to understand how our Website is being used, for example, by telling us if you get an error messages as you browse.

These Cookies collect data that is mostly aggregated and anonymous.

Cookies used for this purpose are often placed on our Website by other organisations, and always with our permission. These Cookies may collect information about your online behaviour, such as your IP address, the website you arrived from and information about your purchase history.

Measuring the effectiveness of our marketing communications, including online advertising

Cookies can tell us if you have seen a specific advert or message, and how long it has been since you have seen it. This information allows us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert.

We also use Cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you

Your choices when it comes to Cookies

You can use your browser settings to accept or reject new Cookies and to delete existing Cookies. You can also set your browser to notify you each time new Cookies are placed on your computer or other device. You can find more detailed information about how you can manage Cookies at the All about Cookies and Your Online Choices websites.

If you choose to disable some or all Cookies, you may not be able to make full use of our Website.

For example, you may not be able see details of our services.

Those Applying for an account or where we are opening a supplier account:-

We will also collect additional information from customers' who apply for and/or obtain credit accounts plus where we apply for a supplier account including:

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Privacy Policy continued

Those Applying for an account or where we are opening a supplier account continued:-

- Your bank account details (or those of the payer) (or the supplier account information)
- Your credit history and other financial information either via credit searches you have authorised as part of your application or that you have provided as part of your application.

Whenever your account is used we will collect transactional information regarding the goods purchased, payment method, date and time of purchase.

Whenever we use a supplier we will also collect transactional information regarding orders, deliveries in particular on time in full information for our Quality KPIs as well as payment methods and dates of purchase.

Other sources of personal data

We may also use personal data from other sources, such as specialist companies that supply information.

We may also obtain personal information from credit or reference agencies, the Land Registry and Companies House in respect of any credit applications or where other guarantees are required.

Members of the Public.

From time to time we may be contacted by individuals who are not the account holder.

In those circumstances we will gather sufficient information to address the query or issue (such as name, address and contact details). In some cases, we may need to pass that information on to a third party, such as a supplier (in the event of a product related query) or a third-party advisor in order to address the matter in question. Any information obtained will be processed purely for the purpose of the single issue or query raised and will be deleted in line with our retention policy once the matter has been closed.

We need to process your personal data so that we can manage your customer accounts, provide you with the goods and services you want to buy and to help you with any orders and refunds you may request. Processing your data in this way is necessary to enable us to fulfil our obligations to you as your customer.

Sharing personal data with Third Parties and Service Providers

This section explains how and why we share personal data with third parties and Service Providers.

When we share personal data with these companies we require them to keep it safe.

We work with a number of Third Parties who –

In the main we will share only anonymised aggregated data with suppliers. However in some circumstances we may also share personal data (pseudonymised or anonymised where possible) to enable those suppliers to deliver their services such as:-

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Privacy Policy continued

Sharing personal data with Third Parties and Service Providers continued

- Those undertaking market research, surveys or gathering other industry related information relating to the Service we provide to you.

Service Providers

We work with carefully selected Service Providers that carry out certain functions on our behalf.

These include, for example,

- companies that help us with technology services, storing and combining data,
- processing payments, credit checking and
- those who provide service on our behalf such as delivering orders to your premises,
- sending communications on our behalf or market research.
- We only share personal data necessary to enable our Service Providers to provide their services.

Sharing personal data with other organisations

This section explains how and why we share personal data with other organisations.

We may share personal data with other organisations in the following circumstances:

- if the law or a public authority says we must share the personal data;
- if we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk);
- to an organisation we sell or transfer (or enter into negotiations to sell or transfer) our business or any of our rights or obligations under any agreement we may have with you to. If the transfer or sale goes ahead, the organisation receiving your personal data can use your personal data in the same way as us;
- to any other successors in title to our business.

Disclosure of your information inside and outside of the EEA

We will share your personal information with:

We do not disclose information about identifiable individuals to our marketing providers, but we will provide them with aggregate information about our customers or suppliers.

To confirm where information is transferred as part of our IT system to countries outside the European Economic Area it will not have personal information within it or information that has been obtained from personal information provided.

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Privacy Policy continued

Disclosure of your information inside and outside of the EEA

We will share your personal information with continued:

We may also use such aggregate information to help advertisers and or marketing providers reach the kind of audience they want to target

Selected third parties including:

We may make use of the personal data we have collected from you to enable us to comply with our marketing partners information needs in identifying the appropriate target audience this may include:

- analytics and search engine providers that assist us in the improvement and optimisation of our site;

Selected third parties including:

- clients for the purpose of introducing our services to them;
- clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- sub-contractors including email marketing specialists, event organisers, payment and other financial service providers including umbrella companies.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.
- Computer programme Design/Management companies

We may make use of the personal data we have collected to enable us to comply with our business needs and to comply with all legal obligations this may include:

- credit reference agencies,
- our insurance broker,
- compliance partners and other sub-contractors for the purpose of assessing your suitability or the suitability of your organisation where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.

- If Armolloy (UK) Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business and other agreements; or to protect the rights, property, or safety of Armolloy (UK) Ltd, our customers, or others.

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Privacy Policy continued

We will disclose your personal information to third parties continued:

- This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third-party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfil their legal obligations.

Where we store and process your personal data

Including transferring personal information outside the European Economic Area

The Company will not transfer your personal information to countries outside the European Economic Area.

Where information is transferred as part of our IT system to countries outside the European Economic Area it will not have personal information within it or information that has been obtained from personal information provided.

By submitting your personal data, you agree to this transfer, storing or processing. Armolloy (UK) Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using suitable technology.

Where necessary and if you have chosen a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential.

We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We do the following to try to ensure our data is accurate:

- Prior to making a contract being undertaken we may check that we have accurate information about you

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We do the following to try to ensure our data is accurate continued:

We keep in touch with you, so you can let us know of changes to your personal data.

The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- its' perceived accuracy;
- our legal obligations;
- the requirements of our sales team in relationship to the industry by country and sector.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system.

We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Retention Notice

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a data retention notice and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We will delete your personal data from our systems if we have not had any meaningful contact with you for 8 years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

For those whose services are provided via a third-party company or other entity, “meaningful contact” with you means meaningful contact with the company or entity which supplies your services.

Where we are notified by such customer or entity that it no longer has that relationship with you, we will retain your data for no longer than 8 years from that point or, if later, for the period of 8 years from the point we subsequently have meaningful contact directly with you.

When we refer to “meaningful contact”, we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our services.

If you are a client or supplier, we will consider there to be meaningful contact with you if you submit an updated request on our website for request any services.

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Privacy Policy continued

Retention Notice continued:

We will also consider it meaningful contact if you communicate with us about potential services, either by verbal or written communication or click through from any of our marketing communications.

Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

Retention Notice exceptions:

Where necessary in relation to our quality management system it may we may need to retain certain information indefinitely however we will not hold any information longer than necessary. Should you require further information regarding this please contact our Data Protection manager.

Your rights

You have the right to ask us not to process your personal data for marketing purposes.

We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

The GDPR provides you with the following rights. To:

- 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 (see below).
- 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 in certain formats, if practicable.
- Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: ico.org.uk/concerns

You can exercise any of your rights at any time by contacting us at Armoloy (UK) Ltd, Mammoth Drive, Wolverhampton Science Park, Wolverhampton, WV10 9TF or via www.armoloy.co.uk

Registered Office:

Mammoth Drive,
Wolverhampton Science Park,
Wolverhampton
West Midlands WV10 9TF
Registered in England
Reg. No. 2360196





ARMOLLOY (U.K.) LTD.

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Tel: +44 (0) 1902 310375 Fax: +44 (0) 1902 310075
e-mail: jillian.h@armolloy.co.uk
web: www.armolloy.co.uk

Privacy Policy continued

Access to information

The GDPR gives you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete.

Your right of access can be exercised in accordance with the Act (and the GDPR once it is in force). A subject access request should be submitted via www.armolloy.co.uk. No fee will apply once the GDPR comes into force.

Reporting a Personal Data Breach

The GDPR requires us to notify any personal data breach to the applicable regulator and, in certain instances, to you.

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

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to www.armolloy.co.uk

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