# **Privacy Notice**

# Purpose of this Privacy Notice

This Privacy Notice describes how we collect and use personal data about you and the rights you have in relation to that data in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act and other national implementing laws, regulations and secondary legislation, as amended and updated from time to time, in the UK ("Data Protection Legislation").

### About us

Zettonics Limited is a company registered in England under number 12034171 with its registered address at 20 Clarke Road Milton Keynes MK1 1LG. For the purposes of the Data Protection Legislation, we are the data controller. This means that we are responsible for how we hold and use personal data about you. We have appointed a data protection manager, who is responsible for assisting with enquiries in relation to this Privacy Notice or our treatment of your personal data. Should you wish to contact our data protection manager you can do so using the contact details noted in this Privacy Notice.

### How we may collect your personal data

We may obtain personal data about you, for example when:

- You send the information to us
- You complete a trade credit account application form
- You request a quotation or enquire about our products or services
- You place an order with us
- You supply us or intend to supply us with goods and services
- You complete a job application form or otherwise approach us in respect of employment
- We use publicly available resources (e.g. Companies House, credit reference agencies)
- We undertake relevant product, application and industry marketing activities and partners (e.g. email marketing, Linked-In campaigns, exhibitions, other marketing events, brand, franchise or manufacture partner referrals)

## The kind of information we hold about you

The information we hold about you may include:

- Your personal contact details (such as your name, title or function/role, email and postal addresses, telephone numbers)
- Details of enquiries, quotations and transactions that we have had with you in relation to the products and services we have provided and may provide in the future
- Correspondence and communications between us
- Bank account or other payment details
- Personal information required in relation to your proposed, current or prior employment with us
- IP addresses of visitors and, by using cookies, (software that the website stores on your device and gathers information from your browser) keep track of your visits to our websites.

# Cookies

We use them to improve the experience of our websites for you by remembering certain settings (such as your password so that you don't have to re-enter it) or the pages you previously visited. You can usually change your browser so that it will not accept cookies. However, in a few cases some of our website features may not function as a result.

Unless you have adjusted your browser settings so that it will refuse cookies (see http://www.ico.org. uk/for\_the\_public/topic\_specific\_guides/online/cookies for the Information Commissioner's Office guidance on how to do so) our system will issue cookies when you log on to our websites and we use them for the following purposes:

- Strictly Necessary Cookies these are needed for the operation of our websites;
- Analytical/performance Cookies these allow us to monitor user numbers to our websites and track users round the Website to ensure that our website is functioning well;
- Functionality Cookies these allow us to recognise users when they return to our websites, allowing us to personalise the user experience; and
- Targeting Cookies these track an individual user's journey through our websites including
  pages visited and any links clicked on. We can use these cookies to create profiles of user
  behaviour.

The cookies used by us will expire after ten years, or after two years if you have not used our websites in that period, unless cleared via the user's browser.

# Other websites

Our websites may contain hyper-links. These hyper-links connect you to websites of other organisations which are not our responsibility. We have used our reasonable endeavours in preparing our own Website and the information included in it is done so in good faith. However, we have no control over any of the information you can access via other websites. This Privacy Notice only applies to our websites so when you link to other websites you should read their own privacy statements.

## How we use personal data we hold about you

We require and process your personal data for the purposes necessary for the performance of a contact that exists between us if you are an employee or if you are a customer, supplier or subcontractor (for whom you may be an employee, subcontractor or agent) and to comply with our legal obligations. If you refuse to provide us with certain information, we may not be able to perform the contract we have entered into with you, or your employer, or comply with our legal or regulatory obligations.

We may also process your personal data for our own legitimate interests (provided that those interests do not override any of your rights). This includes sending you information, advice, offers and updates to promote and market our business and current or proposed products and services, undertake business development or analysis and management purposes.

We use your IP address and cookies to help diagnose problems with our server and to administer our Website, to identify you and your details on our database. We monitor customer traffic on an aggregate basis to help us develop and improve our websites for the benefit of our customers.

We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

We may anonymise or pseudonymise the personal data so that it can no longer be associated with you in which case me may use it without further notice to you.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

#### Change of Purpose

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose. Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so.

#### Data retention

We will only retain your personal data for as long as it is necessary to fulfil the purposes for which it is collected, taking into consideration

- The requirements for our business to supply products and services
- Any statutory and legal obligations
- The purposes for which we collected the data
- The types of data we have collected
- The amount and categories of your personal data
- Whether the purpose of the processing could reasonably be fulfilled by other means.

### Data sharing

#### Why might we share your information?

We may share your information with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest.

#### Which third parties might process personal information we have collected?

This will include third-party services providers such as logistics partners, IT and software service or infrastructure providers, financial institutions, accounting and audit firms. All our third-party service providers are required to take their own commercially reasonable and appropriate compliance and security measures to protect your personal data. We only permit our service providers to process your personal data for specified purposes, in accordance with our instructions and under a duty of confidentiality.

We will not sell, rent or pass your information on to others for marketing purposes without your express consent. We may however provide aggregate statistics about our customers, sales traffic patterns and related site information to reputable third-party vendors and relevant affiliate partners, but these statistics will include no personally identifying information. We may also release account information where we believe in good faith that this release is reasonably necessary to comply with the law.

# Transferring your data outside the European Economic Area ("EEA")

We will not transfer your data outside of the EEA unless it is to a country where the same standards apply as in the EU or where Privacy Shield agreements are in place (for example where third-party IT service provider may store a backup or undertake processing of information on servers based in the US).

# Data Security

We have put in place commercially reasonable and appropriate security procedures to prevent your personal data being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to those employees, agents, contractors or other third parties who need to know.

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

## Your consent

By agreeing to this Privacy Notice, contacting us or contracting with us in the manner as outlined above, you are consenting to us collecting and processing your personal data in accordance with this Privacy Notice.

# Rights of Access, Correction, Erasure and Restriction

#### Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

## Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest and there is something about your situation which makes you want to object to processing on this basis. 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 data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.
- If you want to exercise any of the above rights, please email our data protection manager dp@ matrixgn.com.

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

### Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### Other applicable policies and terms

If you choose to purchase products from us you will do so subject to our Terms and Conditions of Sale. If you wish to sell products to us you will do so subject to our Terms and Conditions of Purchase. If you choose to access our websites, you will do so subject to our Website Terms of Use.

### Changes to this Privacy Notice

Any changes we may make to our Privacy Notice in the future will be provided to you via an updated Privacy Notice and sent to you or published on our websites. This Privacy Notice was last updated in May 2018.

### **Contact Us**

If you have any questions regarding this notice or if you would like to speak to us about how we process your personal data, please contact:

Data Protection Manager Zettonics Limited 20 Clarke Road Milton Keynes MK1 1LG Telephone +44 (0) 1908 951000

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Telephone 0303 123 1113 (local rate) or +44 (0) 1625 545 745 Website https://ico.org.uk/concerns