

PRIVACY POLICY

Introduction

Nobelus Europe Ltd (“we” or “our” or “us”) is committed to protecting the privacy and security of personal data and is the controller responsible for your personal data. For the purpose of this policy, references to “you” or “your” mean the person whose personal data we collect and process.

This policy is intended to apply to our customers (any business or organisation, including its employees, agents or contractors, using our goods and services) and any user of our goods and services or accessing our website. Our website is not intended for children and we do not knowingly collect personal data relating to children.

In the course of our dealings with you, we will collect and process personal data in order to provide you with the goods and services you request and to support our ongoing business relationship with you. We collect and process your personal data when you provide information or contact us to request goods and services from us or when you sign up to a newsletter or request information about a product or service from us or when you visit our website at www.nobelus.com/UK.

Purpose of this Policy

This policy provides information on how we collect, retain, process, use and share with third parties the personal data we hold about you and how you can exercise your rights with respect to your personal data in accordance with the UK General Data Protection Regulation (“UK GDPR”) and will also set out how our website processes, stores and protects user data and information.

We reserve the right to change this policy from time to time. We will post any adjustments to the policy on our website, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal data previously collected from you through our website or services, we will notify you through the website or by email, or other communication.

Types of personal data we collect about you

The types of personal data we may collect, retain, process and use are as follows, which we have grouped together for ease but this is not an exhaustive list:

- **Identity Data** which includes first name, last name, email address or similar identifier
- **Contact Data** which includes billing address, residential or registered company address, email address, telephone numbers and delivery notes.
- **Technical Data** which includes internet protocol (IP) address, your login data, 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 our website and services.
- **Financial Data** which includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us including notes about conversations and meetings we have relating to goods or services we provide to you and voicemail recordings.

- **Usage Data** includes information about how you use our website and services including product selection history.
- **Profile Data** which includes purchases and orders made by you, your interest, preferences, feedback and purchasing habits.
- **Marketing and communications data** which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you provide us with information about another person, you must do so with their express consent and in the knowledge that they are fully aware of the ways in which we use their personal data, as set out in this privacy policy.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will 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 data so that it can directly or indirectly identify you, we treat the combined data as personal data 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.

Our 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.

If you fail to provide personal data

Where we need to collect personal data 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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How do we collect your personal data?

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

Direct interactions: You may give us your personal data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:

- Purchase our goods and/or services or use our website;
- Create an account on our website or otherwise;

- Contact us to report a problem with the website or goods and/or services, or for any other purpose;
- Request marketing to be sent to you; or
- Give us feedback or contact us.

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 information by using cookies and other similar technologies. For more information about the cookies we use, please see https://nobelus.co.uk/Nobelus_UK_Cookies_Policy.pdf

Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below.

CCTV: Our site(s) are protected by fixed and domed cameras designed to capture and record images of individuals and properties (“**CCTV**”) and CCTV cameras are used throughout our premises as deemed necessary in order to maintain a safe environment for staff and visitors. However, we recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection legislation. As a controller, we have registered our use of CCTV with the Information Commissioner’s Office (**ICO**) and seek to comply with its best practice suggestions. You can request our policy on the use of CCTV from the Managing Director.

How we use your personal data

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.

Please see the table below to find out more about the types of lawful basis that we will rely on to process your personal data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
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 (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
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	(a) 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 reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
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 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 goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for processing your personal data

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 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.

Promotional Offers

We may use your Identity, Contact, Technical, Usage and Profile 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, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services 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 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/service purchase, warranty registration, product/service experience or other transactions.

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 https://nobelus.co.uk/Nobelus_UK_Cookies_Policy.pdf

Change of Purpose

We will only use your personal data 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 data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Who we share your personal data with:

We may share your information with another organisation set out below for the purpose of supplying/delivering products or services which have been ordered/requested or other purposes as set out in the above table:

- Service providers who provide payment, marketing, IT and system administration services, storage and transport services.
- Regulators and other authorities in the United Kingdom who require reporting of processing activities in certain circumstances, especially in the prevention of money laundering and fraud.
- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances
- We use analytics services such as Google Analytics to collect and process certain analytics data relating to use of our website. These services may also collect information about your use of other websites, apps, and online resources. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/>, and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
- Our internal third parties include McKinleys Group Trading Ltd, McKinleys Group Holdings Ltd and Nobelus Europe, LLC, a copy of their privacy notices are available at [McKinleys Privacy Policy](#) and [Nobelus Privacy Policy](#)
- 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 data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We never sell your information to third-parties.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data 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.

Data Retention

How long will we use your personal data for?

We will only retain your personal data 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 data 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 data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (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.

Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data for example:

- **Access to information:** You may have the right to request a copy of the information we hold about you.
- **Ensuring accuracy of information:** We want to make sure that your personal data is accurate and up-to-date. You may have the right to ask us to correct or complete information that is inaccurate or incomplete.
- **Right to erasure:** You may have a right to erasure, which is more commonly known as the 'right to be forgotten'. This means that in certain circumstances you can require us to delete personal data held about you.

- **Ability to restrict processing:** You may also have the right to require us to restrict our use of your personal data in certain circumstances. This may apply, for example, where you have notified us that the information we hold about you is incorrect and you would like us to stop using such information until we have verified that it is accurate.
- **Right to data portability:** You may have the right to receive personal data we hold about you in a format that enables you to transfer such information to another data controller (e.g. such as another service provider).
- **Review by an independent authority:** You may have the right to lodge a complaint with a supervisory body, including the ICO as listed below.
- **Preventing direct marketing:** From time to time, we may send emails containing information about new features and other news about us. You may opt out of those emails as described above in the Marketing section of this notice.
- **Objecting to other uses of your information:** You may also have the right to object to our use of your personal data in other circumstances. In particular, where you have consented to our use of your personal data, you have the right to withdraw such consent at any time.

If you would like further information on how you can exercise these rights, please contact us at the contact details provided below.

No fee usually required: 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 is clearly unfounded, repetitive or excessive. Alternatively, we may 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 data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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 or for data subjects outside the UK and EU, the period required by applicable law.

Updates to this notice

We keep our privacy policy under regular review and so this policy may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, the updated version will be posted on our website.

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

Contact details

Please address any questions or requests relating to this notice to the Finance & Admin Manager on the following contact details:



Nobelus Europe Ltd at Denmark House, Victoria Way, Studlands Park Industrial Estate, Newmarket, United Kingdom, CB8 7AU.

Telephone: +44 (0)1638 591187
Email: accounts.eu@nobelus.com

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Lawful Basis: Glossary

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/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 data for our legitimate interests. We do not use your personal data 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 data 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 data where it is necessary for compliance with a legal obligation that we are subject to.

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