



## CUSTOMER PRIVACY NOTICE

### INTRODUCTION

SHL Refractories (UK) Ltd takes your privacy very seriously and has put in place a privacy policy. SHL Refractories (UK) Ltd Privacy Policy governs the use of your data and ensures your personal data is managed with appropriate care. This Privacy Notice is supplemental to the SHL Refractories (UK) Ltd Privacy Policy and sets out details of how, when and why your personal data is collected and processed by or on behalf of SHL Refractories (UK) Ltd

This Privacy Notice was last updated on 31 May 2018.

We may review this Privacy Notice from time to time and any changes will be notified to you by posting an updated version on our website and/or by contacting you by email.

If you have any questions about how we collect, store and use your personal information, or if you have any other privacy-related questions, please contact our Data Protection Lead, David King by email at [david.king@shlref.com](mailto:david.king@shlref.com)

### WHO WE ARE

In this Privacy Notice the terms ("we", "us", "our") refers to SHL Refractories (UK) Ltd and for the purposes of the General Data Protection Regulation SHL is the data controller of the data we hold on you. The registered office of SHL is Celcius House, Lawn Road Industrial Estate, Carlton-in-Lindrick, Nottinghamshire, S81 9LB, UK.

A "data controller" determines the purpose and means of processing your personal data.

### HOW WE COLLECT YOUR PERSONAL INFORMATION

We may collect and process the following information about you:

**Personal information you give to us:** this is information about you that you give to us:

- During site visits;
- when corresponding with us by phone, email or otherwise;
- via social media platforms.

**Personal information we collect about you:** we may collect the following information:

- information resulting from enquiries, quotations or sales whether by phone, email or in person on site.
- any personal information which you allow to be shared as part of your public profile or third party social network.



**Personal information we may receive from other sources:** we obtain certain personal information about you from sources outside our business which may include third party companies. We will tell you when we obtain information about you from third party companies.

## WHAT TYPE OF PERSONAL INFORMATION DO WE COLLECT AND PROCESS ABOUT YOU

The types of data we hold relating to you are as follows:

- Name;
- Company for whom you work;
- Address;
- Email address(es);
- Telephone number(s);
- Your signature;
- Correspondence or other communications with you about our products, services or business.

We do not collect any "special categories of personal data" about you. Special categories of personal data include information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data for identification purposes.

## WHY AND HOW WE USE YOUR PERSONAL INFORMATION

We use the Information we hold on you for managing and performing our contracts with you: including answering enquiries, providing quotations, dealing with plans and specifications, placing orders and delivering goods to you or your customers.



## The legal grounds for our uses of your personal information.

Legal basis	Type of processing
<p data-bbox="256 407 491 430"><b>Legitimate interests</b></p> <p data-bbox="256 465 587 488">Our legitimate interests are:</p> <ul data-bbox="304 524 778 674" style="list-style-type: none"><li data-bbox="304 524 619 546">• business development;</li><li data-bbox="304 555 778 674">• to provide goods and services to our customers, provide customer services and to know the customer that we are providing goods and services to.</li></ul>	<ul data-bbox="801 465 1359 1122" style="list-style-type: none"><li data-bbox="801 465 1359 546">• processing your account application, managing changes to your personal deliveries, and responding to queries from you;</li><li data-bbox="801 555 1359 674">• processing data you give us about your customers for the purposes for which you provide us with that data and as a record of any sale and delivery;</li><li data-bbox="801 683 1034 705">• placing orders;</li><li data-bbox="801 714 1257 763">• making deliveries to you and your customers;</li><li data-bbox="801 772 1257 822">• prevention of fraud and other criminal activities;</li><li data-bbox="801 831 1359 911">• to verify the accuracy of data that we hold about you and create a better understanding of you as a customer;</li><li data-bbox="801 920 1337 943">• to correspond or communicate with you;</li><li data-bbox="801 952 1337 1001">• to comply with a request from you in connection with the exercise of your rights</li><li data-bbox="801 1010 1337 1059">• assess and improve our service to customers through recordings of any calls</li><li data-bbox="801 1068 1337 1122">• management of queries, complaints, or claims</li></ul>
<p data-bbox="256 1178 571 1200"><b>Performance of a contract</b></p> <p data-bbox="256 1236 794 1317">The personal information you provide may be processed when it is necessary in order for us to:</p> <ul data-bbox="256 1352 794 1503" style="list-style-type: none"><li data-bbox="256 1352 794 1375">• enter into or perform a contract with you;</li><li data-bbox="256 1384 794 1433">• supply you with any products or services, or</li><li data-bbox="256 1442 794 1503">• where you are in discussions with us about any new product or service.</li></ul>	<ul data-bbox="801 1236 1359 1444" style="list-style-type: none"><li data-bbox="801 1236 1359 1355">• processing your account / quotation, managing changes to your personal deliveries, and responding to queries from you;</li><li data-bbox="801 1364 1034 1386">• placing orders;</li><li data-bbox="801 1395 1257 1444">• making deliveries to you and your customers;</li></ul>
<p data-bbox="256 1536 660 1559"><b>Compliance with legal obligations</b></p> <p data-bbox="256 1594 794 1706">Where we are under a duty to disclose or share your personal information in order to comply with a request from government or law enforcement officials.</p>	<ul data-bbox="801 1594 1359 1771" style="list-style-type: none"><li data-bbox="801 1594 1359 1675">• to meet national security or law enforcement requirements or to prevent illegal activity;</li><li data-bbox="801 1684 1279 1706">• to identify you when you contact us;</li><li data-bbox="801 1715 1305 1771">• to verify the accuracy of data we hold about you.</li></ul>



## OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION

We will share your personal information internally with our subsidiaries in accordance with our SHL Refractories (UK) Ltd Privacy Policy.

We will also share your personal information to third parties in the following circumstances:

- our suppliers, suppliers of technical and support services, insurers, logistics providers, manufacturers, our legal and other professional advisors, including auditors;
- fraud prevention agencies if false or inaccurate information is provided to us as part of your use of our services or otherwise, and fraud is identified or suspected;
- if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers; and
- when we restructure or sell our business or its assets or have a merger or re-organisation.

If you ask us not to contact you in future, we will take this as an instruction not to do so and will amend our records accordingly.

We work closely with various third parties to bring you a range of products and services which are complementary to those which we provide. Any third parties with whom we share your personal information are limited in their ability to use your personal information: they are not entitled to use your personal information for any purpose other than to provide services to us and/or to you. For example, we may share your details with a manufacturer for warranty purposes. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with our practices and with applicable laws.

## HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR:

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information will depend on the purposes for which we collect and use it, or as required to comply with applicable laws, or to establish, exercise or defend our legal rights.

Further information on the length of time during which we retain your personal information can be found in our Data Retention Process. We do not retain personal information in an identifiable format for longer than is necessary.



For example, we will retain your personal information for 7 years in case of any investigation by the tax authorities.

## YOUR RIGHTS

You have certain rights in relation to your personal information. There is normally no charge for exercising these rights. If you would like further information in relation to these rights, or would like to exercise any of them, please contact us by email at any time. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where not required, after we have received your request.

Subject to any exceptions, you may have the right to:

### **Access your personal information**

You have the right to ask for a copy of the information we hold about you by emailing or writing to us at the address at the end of this Privacy Notice. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold such information.

### **Correct, modify and update your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this Privacy Notice.

### **Erase your personal information or restrict its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this Privacy Notice. Unless there is a reason the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.



## **Object to our use of your personal information**

Where we rely on our legitimate business interests as the legal basis for processing your personal information for any purpose(s) set out above or at the time your data is collected, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this Privacy Notice. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

## **Ask us to transfer your personal information in a structured data file to you or to another service provider if it is technically possible (data portability)**

When processing your personal data in connection with your contract you may ask us to provide you with a copy of such information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if it concerns other individuals or we have another lawful reason to withhold such information.

## **Lodge a Complaint with the competent supervisory authority and seeking a judicial remedy**

If you are concerned about the way we have processed or collected your personal information you have the right to complain to the UK data protection regulator being the Information Commissioners Office (<https://ico.org.uk/>).

## **SECURITY AND CONFIDENTIALITY**

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our website and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

## **Links to other websites**

Our website may contain links to other websites and Apps run by other organisations. This Privacy Notice does not apply to those other websites and Apps, so we encourage you to read their privacy policies. We cannot be responsible for the privacy policies and practices of other websites and Apps even if you access them using any links we provide.



In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of the third party website and recommend that you check the policy of any third party website.

## CONTACT US

a. Our Data Protection Lead is David King. Please direct any queries about this Privacy Notice or about the way we process your personal information to our him using our contact details below.

b. If you wish to write to us, please write to us at Celcius House, Lawn Road Industrial Estate, Carlton-in-Lindrick, Nottinghamshire, S81 9LB, UK.

c. Our email address for data protection queries is [david.king@shlref.com](mailto:david.king@shlref.com)