

Privacy Policy

This is the privacy notice of TrAchem Limited. In this document, "we", "our", or "us" refer to TrAchem Limited, we are company number 3785557 registered in England and Wales and our registered office is at Unit 2 Holmeroyd Business Park, Holmeroyd Road, Carcroft, Doncaster, South Yorkshire, DN6 7EG.

1. Introduction

- 1.1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
- 1.2. We take seriously the protection of your privacy and confidentiality. We understand that all individuals dealing with us are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
- 1.3. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

2. Our privacy policy has been compiled so as to comply with the law of England and Wales, including that required by the EU General Data Protection Regulation (GDPR)

- 2.1. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
- 2.2. Except as set out below, we do not share, or sell, or disclose to a third party, any information that we hold on you, except as explained under Clause 9 below.

3. Introduction

- 3.1. The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.
- 3.2. If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.
- 3.3. If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

4. **Information we process because we have a contractual obligation with you**

4.1. At present we do not hold any of your 'personal data' under this defined base.

5. **Information we process with your consent**

5.1. At present we do not hold any of your 'personal data' under this defined base.

6. **Information we process for the purposes of legitimate interests**

6.1. We do not share any of your personal data with any other company or entity for the purpose of marketing or other purposes.

6.2. You do not have a personal login to our systems and so we are unable to verify under the terms of the regulations that you have consented personally to the retention of your personal data by us. Accordingly, the basis on which we hold your personal data under the regulations is that there is a legitimate interest in our doing so.

6.3. The scope of your personal data we hold is as follows:-

6.3.1. Your designation

6.3.2. Your given name

6.3.3. Your family name

6.3.4. Your position within your organisation

6.3.5. Your office telephone number

6.3.6. Your mobile telephone number

6.3.7. Your contact email address within your organisation

6.3.8. Any other email addresses we hold for you that have been provided either by you or a third party.

6.4. All of the above data falls within the definition of 'personal data' over which you are entitled to privacy.

6.5. We may hold all or any of the above data under this defined base.

7. **Where we process your information, we do so on the basis of having a legitimate commercial interest in doing so, after having given careful consideration to:**

7.1. The processing is not required by law but is of a clear benefit to you or others

7.2. There's a limited impact on your privacy

7.3. You should reasonably expect us to use your data in that way

7.4. We do not wish to bother you with disruptive consent requests when you are unlikely to object to the use of your data given the commercial purposes for which your personal data is held.

8. We may process your data on this basis for the purposes of:

- 8.1. Processing sales orders and quotations from inception to completion,
- 8.2. Providing information regarding:
 - 8.2.1. New products
 - 8.2.2. Price changes
 - 8.2.3. Special offers
 - 8.2.4. Technical and material safety data
 - 8.2.5 Any other data commercially beneficial to you and us,
- 8.3. Responding to any communication from you to which we believe you would expect a response
- 8.4. Protecting and asserting the legal rights of any party
- 8.5. Protecting your interests where we believe we have a duty to do so
- 8.6. Facilitating efficient and effective commercial liaison between your employer and us.
- 8.7. Sharing of your personal data
 - 8.7.1. We do not share your personal data with any third party outside our organisation.
- 8.8. Your personal data may be shared with other individuals within our organisation purely to achieve the purposes set out above.
- 8.9. Control over your personal data
 - 8.9.1. You are legally entitled to view, add to, reduce and delete any of the personal data we hold. If you wish to contact us in order to do any of the above please contact our Data Controller at info@trachem.co.uk

9. Information we process because we have a legal obligation

- 9.1. We are subject to the law. Accordingly we must process your information in order to comply with our statutory obligations, and we must provide your personal data, limited to the definition contained in clause 6.3 above, where we receive a request from an appropriate competent authority. This may include your personal information. We do not share your personal data with any third party, apart from where required under this clause.

10. Complaining

- 10.1. When we receive a complaint, we record the information you have given to us.
- 10.2. We use that information to resolve your complaint.
- 10.3. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for

our sole discretion as to whether we do give information, and if we do, what that information is.

- 10.4. We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.
- 10.5. If you are not happy with our Privacy Policy please contact info@trachem.co.uk, specifying your concerns and setting out how you wish us to respond.
- 10.6. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

11. Information we obtain from third parties

- 11.1. Although we do not disclose your personal information to any third party (except as set out in this notice), if we receive any data that may unintentionally and indirectly include your personal information from third parties whose services we use, we shall treat it as information that we hold in respect of our personal data in the same way as all your personal data in accordance with this Privacy Notice.

12. Access to your personal information

- 12.1. At any time you may review personally identifiable information that we hold about you by contacting us at info@trachem.co.uk.
- 12.2. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

13. Removal of your information

- 13.1. If you wish us to remove personally identifiable information from our records, you may contact us at info@trachem.co.uk with your request.
- 13.2. This may limit the service we can provide to you.

14. Verification of your information

- 14.1. When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before taking any action. This is important to safeguard your information.

15. Retention period for personal data

- 15.1. Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:
 - 15.1.1. To provide you with the services you have requested
 - 15.1.2. To comply with other law, including for the period demanded by our tax authorities
 - 15.1.3. To support a claim or defence in court.

16. **Review of this privacy policy**

16.1. We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

16.2. If you have any question regarding our privacy policy, please contact info@trachem.co.uk.

Signed: _____



Print: Mr K J Taylor

Date: 25.05.2018