

Updated: June 2018

MR GATES FABRICATION SPECIALISTS LTD - PRIVACY POLICY

GDPR STATEMENT

Mr Gates Fabrication Specialists Ltd (and all associated companies) values your interest in our products and services. Your privacy is important to us and we want you to feel comfortable with how we use and store your personal information. This privacy policy provides you with details of how we collect and process your personal data.

The General Data Protection Regulations (GDPR) came into force on 25th May 2018 with a view to strengthening & unifying data protection. GDPR is specifically aimed at protecting Personal Data. The regulation has been introduced by all EU countries with the aim of giving individuals more control about how their personal data is stored. The new law gives you more control over how companies use your personal data and who you receive emails from. You don't need to take any action, but our updated Privacy Policy will give you a better understanding of how we use and protect your personal data.

We have always been very respectful of the data belonging to our clients and our suppliers. GDPR preparation has not changed our objective of fair and transparent Data Controls but it has allowed us to examine how we do things. In brief, we have identified every process where personal data is involved. We have risk assessed the journey that this data takes whilst it is with us and how we protect it, use it and keep it secure. We have also identified all software systems, that store our data and ensured that these are all secure and safe. This includes an audit on our internal CCTV system, which is in place to provide a safe and secure environment. The data is recorded and maintained securely but not shared with any persons unless required by the Police for legal reasons.

PRIVACY POLICY

Mr Gates Fabrication Specialists Ltd (and all associated companies) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website or interact with us as a client or supplier (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE
2. THE DATA WE COLLECT ABOUT YOU
3. HOW YOUR PERSONAL DATA IS COLLECTED
4. HOW WE USE YOUR PERSONAL DATA
5. DISCLOSURES OF YOUR PERSONAL DATA
6. INTERNATIONAL TRANSFERS
7. DATA SECURITY
8. DATA RETENTION
9. YOUR LEGAL RIGHTS
10. GLOSSARY

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice:

This privacy notice aims to give you information on how Mr Gates Fabrication Specialists Ltd collects and processes your personal data during the process of purchasing a product or service including any data you may provide through its website/s when you complete online forms.

Our website/s is not intended for children and we do not knowingly collect data relating to children.

This privacy notice supersedes any other notices previously issued and is intended to override them.

Controller:

Mr Gates Fabrication Specialists Ltd is the controller and responsible for your personal data (collectively referred to as "Mr Gates/MG Group (or named associated companies)", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details:

Our full details are:

Full name of legal entity: Mr Gates Fabrication Specialists Ltd

Name or title of data privacy manager: Ms Seema Chandarana, Director

Email address: seema@mrgates.co.uk

Postal address: Valley House, Northbridge Rd, Berkhamsted, Herts, HP4 1TA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

Changes to the privacy notice and your duty to inform us of changes:

This privacy notice may be changed from time to time as the law develops and/or we change how we process personal data so please check it regularly.

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.

Third-party links:

Our website/s now or in the future 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 notice of every website you visit. We do not share with or sell any data to third party organisations.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

This data is securely stored on Xero and WorkflowMax cloud based software and we are confident that these companies fully comply with General Data Protection Regulations.

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data 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.

Technical Data 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 this website.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We also collect and **use Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does 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 notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, 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.

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 data 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.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

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

- apply for our products or services;
- create an account with us (including the completion of a credit application form);
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions:

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites we operate or other services we provide. Please see our cookie policy for further details].

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

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU; and
- (b) advertising networks such as Facebook, Instagram and Twitter, based both inside and outside the EU.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as, SumUp, CPA based inside the EU.

- Identity and Contact Data from data brokers or aggregators such as Experian or CPA based inside the EU.

- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. 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 or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending you direct marketing communications via email or text message if you are an individual, sole trader or partner in an unlimited partnership. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer (including any necessary credit checking)	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary for our legitimate interests (in order to check your creditworthiness)
	(c) Financial	
To process and deliver your order including: (a) Manage payments, fees and charges	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary for our legitimate interests (to recover debts due to us)
	(c) Financial	
(b) Collect and recover money owed to us	(d) Transaction	
	(e) Marketing and	

	Communications	
To manage our relationship with you which will include:	(a) Identity	(a) Performance of a contract with you
(a) Notifying you about changes to our terms or privacy policy	(b) Contact	(b) Necessary to comply with a legal obligation
(b) Asking you to leave a review or take a survey	(c) Profile	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services and to inform our customers about new products/services)
(c) Sending you our newsletter and other electronic communications	(d) Marketing and Communications	(d) Consent (in relation to the sending of our newsletter where you are an individual, sole trader or partner in an unlimited partnership)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
	(c) Profile	
	(d) Usage	
	(e) Marketing and Communications	
To administer and protect our business and our website/s (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity	(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) Contact	(b) Necessary to comply with a legal obligation
	(c) Technical	
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity	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)
	(b) Contact	
	(c) Profile	
	(d) Usage	
	(e) Marketing and Communications	
	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and	(a) Technical	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and

experiences	(b) Usage	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	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)
	(b) Contact	
	(c) Technical	(b) Consent where you are a sole trader, individual or partner in an unlimited partnership
	(d) Usage	
	(e) Profile	

Promotional offers from us:

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 or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Opting out:

You can ask us to stop sending you marketing messages at any time by clicking on the link at the bottom of one of those messages and then setting your preferences accordingly. 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.

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.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties such as:
 - Xero, CPA and SumUp (for the processing of payments)
 - Experian and CPA (for the purpose of credit checking)

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area.

7. 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.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may 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.

Generally we keep any data in relation to an order you place with us for six years (for taxation and accounting purposes) and we will keep marketing information for as long as you

continue to wish to receive marketing from us. If you have withdrawn consent to marketing we may keep your details in order to ensure that no further marketing information is sent to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact:

Ms Seema Chandarana, Director

Email address: seema@mrgates.co.uk

Postal address: Valley House, Northbridge Rd, Berkhamsted, Herts, HP4 1TA

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. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

Lawful basis:

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 or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third parties:

- Internal Third Parties

Other companies in the Mr Gates Group acting as joint controllers or processors provide IT and system administration services and undertake leadership reporting.

- External Third Parties

Service providers acting as processors based in the UK who provide IT and system administration services.

- **Professional advisers** acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

- **HM Revenue & Customs**, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

- **Third parties who fulfil an order on your behalf**, couriers and delivery companies and recovery agencies in the event that we are required to recover a debt from you.

YOUR LEGAL RIGHTS

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of

erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent