



GDPR: PRIVACY NOTICE

Privacy Notice

This Privacy Notice sets out what personal data we, Fluorocarbon Group of companies, hold about you and how we collect and use it.

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other information that we might give you from time to time about how we collect and use your personal data. You should also read our Data Protection Policy which explains our obligations in relation to personal data and how we keep it secure.

This Privacy Notice applies from 25 May 2018, when the General Data Protection Regulation comes into force. We may update this Privacy Notice at any time.

Who is the controller?

Fluorocarbon Group is the “controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

The Company have appointed Data Protection Champion(s) who can be contacted via dpchampions@fluorocarbon.co.uk As Data Protection Champion(s), they are responsible for informing and advising us about our data protection law obligations and monitoring our compliance with these obligations. They also act as your first point of contact if you have any questions or concerns about data protection.

What type of personal data do we hold about you?

Personal data means any information relating to a living individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, company they work for, email address, physical features). It can be factual (e.g. contact details or date of birth), an opinion about an individual's actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

We may hold various types of personal data about you, including, for example your name, email address, postal address and contact telephone number.

Our website site uses cookies to store information on your computer. Some of these cookies are essential to make our site work and others help us to improve by giving us some insight into how the site is being used. These cookies are set when you submit a form, login or interact with the site by doing something that goes beyond clicking some simple links.

We also use some non-essential cookies to anonymously track visitors or enhance your experience of this site. If you're not happy with this, we won't set these cookies but some nice features on the site may be unavailable.

We use Google Analytics that tracks Users and Active Users metrics show how many users engaged with our site.

In order for Google Analytics to determine which traffic belongs to which user, a unique identifier associated with each user is sent with each hit. This identifier can be a single, first-party cookie named `_ga` that stores a Google Analytics client ID.

We also use Leadfeeder which uses our Google Analytics data to identify companies visiting our website; this does not however identify individual personal data.

To control third party cookies, you can also adjust your browser settings.

Data protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data that is used to identify an individual is known as **special category** data. (The rest is **ordinary personal data**).

Why do we hold your personal data and on what legal grounds?

We hold and use your ordinary personal data for business administration purposes. This will include, for example: meeting our contractual obligations, management of your account, day-to-day business activities such as quotations, despatching orders, invoicing etc.

Data protection law specifies the legal grounds on which we can hold and use personal data.

Most commonly, we rely on one or more of the following legal grounds when we process your personal data:

- Where we need it to perform the contract we have entered into with you (**performance of the contract**) a contract for services or another type of contract.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (**legitimate interest**). This may include, for example, sending information regarding products and services that may be of interest to you.

How do we collect your personal data?

You provide us with most of the personal data about you that we hold and use, face to face, over the phone or online. Other personal data about you we hold and use is generated by you in the course of carrying out our duties. For example, during email correspondence with our staff.

Some of the personal data we hold and use about you is provided by or generated from internal sources during the course of running our business. For example, colleagues may refer to you in emails or documents.

What is the purpose of collecting this data?

We use this data to provide services to you as an individual or to your company, for administrative purposes and to send communications (when agreed to) from time to time regarding products and services that you might be interested in.

If you give us someone else's personal data

Sometimes, you might provide us with another person's personal data – e.g. details of a colleague. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

Who do we share your personal data with?

We will not share your personal data with third parties without asking your permission first.

Consequences of not providing personal data

We only store the data that we actually need to administer your account and won't keep it any longer than necessary. We may not be able to meet your account requirements if we do not have this data.

How long will we keep your personal data?

We will not keep your personal data for longer than we need it for our legitimate purposes.

We take into account the following criteria when determining the appropriate retention period for personal data:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes
- how long the personal data is likely to remain accurate and up-to-date
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

It is difficult to specify ahead of time precisely how long we will keep particular items of personal data. Where possible, the Tables in the Appendix to this Privacy Notice identify retention periods applicable

Fluorocarbon Group incorporating: Fluorocarbon Limited, Fluorocarbon Surface Technologies Ltd & Fluorocarbon Polymers SRL

Policy name: General Data Protection Regulation (GDPR), Privacy Notice

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to your personal data, which have been determined on the basis of the above criteria and which represent the longest period for which we will ordinarily keep it. We may often keep particular items of your personal data for less time. However, there may also be circumstances in which it is appropriate for us to keep particular items of your personal data for a longer period than that set out in the Tables. In particular, we will always keep your personal data for so long as we are required to do so under legal, accounting, reporting or regulatory requirements.

In addition, for some types of personal data, it is more appropriate to decide retention periods on a case by case basis (also using the criteria described above), and this is indicated in the Tables where applicable.

We will base these decisions on relevant circumstances, taking into account the criteria listed above.

Solely automated decision-making

Solely automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not currently use solely automated decision-making.

Transferring personal data outside the EEA

An overseas transfer of personal data takes place when the data is transmitted or sent to, viewed, accessed or otherwise used in, a different country. Data protection law restricts transfers of personal data to countries outside of the European Economic Area (EEA) because the law in those countries might not provide the same level of protection to personal data as the law in the EEA. To ensure that the level of protection afforded to personal data is not compromised, therefore, we are only able to transfer your personal data outside the EEA if certain conditions are met, as explained below.

We may transfer some of your personal data to the following countries outside the EEA: United States of America.

- There is an adequacy decision by the European Commission in respect of The USA. This means that The USA is deemed to provide an adequate level of protection for your personal data.

Your rights

You have a number of legal rights relating to your personal data, which are outlined here:

- **The right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are

lawfully processing it.

- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **The right to request that we delete or remove** personal data that we hold about you 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).
- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing
- **The right to request that we restrict our 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.
- **The right to request that we transfer** your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).
- **The right to object to a decision** based on profiling/solely automated decision-making, including the right to voice your opinion, and obtain human intervention in the decision-making.

If you would like to exercise any of the above rights, please contact the Data Protection Champion(s) via email at dpchampions@fluorocarbon.co.uk in writing. Note that these rights are not absolute and in some circumstances we may be entitled to refuse some or all of your request.

If you have any questions or concerns about how your personal data is being used by us, you can contact the Data Protection Champion(s) via email at dpchampions@fluorocarbon.co.uk

Note too that 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. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

APPENDIX – FURTHER DETAILS

This section of the Privacy notice tells you in more detail about the type of personal data we hold about you, what we use it for, our legal grounds for doing so, who we share it with and how long we keep it.

Please note that we will not necessarily hold, use or share *all* of the types of personal data as described in this Appendix in relation to you. The specific types of data about you that we will hold, use and share will depend on your interaction with the Fluorocarbon Group. For example, if you do not visit our site we will not hold any visitor or health & safety information.

Note also that the first two Tables below divide items of personal data into relatively broad categories (under the heading “Type of ordinary personal data held by us”, or “Type of special category personal data held by us”). Where multiple purposes and/or legal grounds for our use of a given “type” of personal data are identified, this does not necessarily mean that *all* of the purposes and/or legal grounds are applicable to *all* items of personal data falling within that “type” of personal data.

More information about your ordinary personal data

Type of ordinary personal data held by us	What we use it for	Legal ground	Guideline retention period
Health and safety	Conducting risk assessments; establishing safety measures to mitigate identified risks; providing a safe working environment; keeping required records	Legal obligation In our legitimate interest to ensure Visitors are able to perform their duties in a safe environment for the efficient operation of the business	Decided on a case by case basis in accordance with the criteria set out in this Privacy Notice, in particular any legal requirement to retain particular records
CCTV footage	Primarily for security purposes, although we may also use CCTV footage when investigating allegations of misconduct by Employees	Legal obligation Performance of the contract In our legitimate interest to deal effectively with allegations of misconduct and to maintain the security of our premises	7 days after date on which footage was recorded
Personal data produced by you and others in the course of carrying out your job (e.g. job-related emails, social media presence)	Performance of job duties by our employees, carrying on the business of the company; monitoring your business social media	Performance of the contract In our legitimate interest to carry out the company business	Decided on a case by case basis in accordance with the criteria set out

	presence.		in this Privacy Notice
Personal data, which may include any of the types of data set out in this Appendix, that is relevant to our strategic decision making processes, to planning business operations, actual and potential legal claims, corporate reporting and business risk analysis	To enable us to carry out the company business, analyse current business performance, plan for the future, present information in reports to relevant audiences such as shareholders, protect the company from legal claims, seek professional advice as and when required in the course of running our business	Legal obligation Performance of the contract In our legitimate interest to carry out the company business, including taking strategic decisions in the interest of the business, communicating about the business with relevant audiences and seeking professional advice where appropriate	Decided on a case by case basis in accordance with the criteria set out in this Privacy Notice

More information about how we share your personal data

Who we share your personal data with	What data we share	Why we share it	Legal ground
Companies within the Fluorocarbon Group	Any of your personal data that is relevant	To make business decisions such as: To manage the company's or group's business. To monitor company performance.	Legal obligation Performance of the contract In our legitimate interest to manage the businesses within the group.
<i>IT support provider, CRM system. MRP system, etc.</i>	Any of your personal data that is relevant Contact details	Data is saved on the cloud based system.	Performance of contract In our legitimate interest to engage appropriate service providers to manage IT, etc.
Our legal and other professional advisers appointed from time to time	Any of your personal data that is relevant	To obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you or; to obtain advice on business management	Legal obligation Performance of contract In our legitimate interest to seek professional advice to clarify our rights/obligations and

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		and planning, including accounting advice; to independently audit our accounts	appropriately defend ourselves from potential claims; to manage the business and its finances
Potential purchasers/new service providers	Any of your personal data that is relevant	To provide relevant information to prospective purchasers or new service providers in the event of a possible business transfer, a business or share sale, takeover or other corporate transaction	Legal obligation In our legitimate interest to consider/proceed with a transfer/sale of the business and information is required by prospective purchasers