

# **Privacy Policy**

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This Privacy Notice regulates the use and protection by Bannertite and its group affiliates or if applicable joint venture entities of "personal data" you provide to Bannertite when using this Website. Personal data is information which identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual.

#### Who we are

Bannertite is a data controller under the Data Protection Act 1998 collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

# The personal information we collect and use Information collected by us

Personal Data: We will not collect any personal data about you or individuals accessing this website, except where it is specifically and knowingly provided or where it is necessary for Bannertite to process or hold for the purposes of the goods or services it provides and where there is a valid legal basis for doing so. Examples of personal data that you may provide to us when accessing this Website, and which we may collect and process, are:

personal details such as: your name, address, email address, telephone number and occupation;

Bannertite will also collect information about your computer, including where available and subject to your chosen cookie and privacy settings as made available on the Website your IP address, operating system and browser type and we may share non-personal aggregated statistics about our website visitors' traffic patterns with authorised partners with a need to know namely, Google Analytics or Site Improve analytics or our authorised nominated web developer



suppliers. However, we will not collect, sell or share any information about individual users.

#### Where we store your personal data:

All personal data you provide to us via the use of this Website is stored on systems with appropriate technical and organisational security measures and controls located within the European Economic Area, which are sufficient to comply with the requirements under the Data Protection Laws. We will only store your personal data for as long as necessary for Bannertite to process such personal data for the purposes set out in this Privacy Notice and in accordance with Bannertite internal retention policies and procedures (as updated). The accuracy of the information that we hold about you is important to us. If any of the personal information we hold about you becomes inaccurate or out of date (e.g. a contact/contact information changes), or you object to or wish to restrict us processing it, please inform us as soon as possible using the contact details below, so we can update our records.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## How we use your personal information

We use personal data held about you for the following purposes:

To send news updates to our Website subscribers. This may include press release announcements, financial results and other important news or alerts.

To carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;

To ensure that content from our Website is presented in the most effective manner for users;

To allow you to participate in interactive features on or via our Website;

To contact you in order to send you information that you have asked us to provide such as newsletters or information on Bannertite projects or initiatives either by email, telephone or via our 'contact us' page or which we think may be useful to you or to send marketing information to you only where you have explicitly consented to this via a separate consent form referencing this privacy notice;

To notify you about our services and any changes to those services;

To collect information such, as subject to your chosen cookie and privacy settings as made



available on the Website, your IP address, operating system and browser type for the purposes of website analytics and sharing of non-personal aggregated statistics about our website visitors' traffic patterns with authorised partners with a need to know namely, Google Analytics or Site Improve analytics or our authorised nominated web developer suppliers.

Complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes;

Complying with demands or requests made by any relevant regulators, government departments and law enforcement authorities or in connection with any disputes or litigation;

In connection with any sale, merger, acquisition, disposal, reorganisation or similar change of entity managing website's business.

Unless otherwise agreed with you, we will not use any of your personal data for automated decision-making or profiling.

#### Who we share your personal information with (disclosure of your information)

We will share your information with the Bannertite group of companies (if applicable) and, where relevant, their professional advisers. Where required by law or regulatory requirement, or where necessary to fulfil our contract with you, we may also share your information with:

other companies who provide goods/services to us;

our professional advisers and auditors;

regulators, government departments, law enforcement authorities, and insurance companies;

any relevant ombudsman, dispute resolution body or the courts; and

persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the Bannertite business.

Personal data shall not be transferred to or stored at a destination outside the European Economic Area ("EEA").

The transmission of information via email or the internet is not completely secure. We cannot guarantee the security of your data transmitted to our site; and any transmission is at your own risk.

Legal Basis for Processing: Data Protection Laws require that we meet certain conditions before we are allowed to use your personal data as described in this Privacy Notice. For personal



data which is not 'sensitive personal data' or 'special categories of personal data' under Data Protection Laws, unless otherwise notified, we rely on a condition known as "legitimate interests" in order to process your personal data for the above specified purposes. For example, it is in our legitimate interests to process your personal data in relation to your business contact names, and contact details where it is required by us in order to for us to:

ensure that content from our Website is presented in the most effective manner for users;

allow you to participate in interactive features on or via our Website

administer and respond to inquiries from you in connection with your use of the Website or our products or services; and

procure goods and services for you as a supplier where applicable;

meet legal obligations under the GDPR and applicable data protection laws to hold necessary information as part of our GDPR compliance programme record-keeping obligations.

We will ensure that the collection and processing of your personal data:

is kept to a minimum with regards to the amount of data collected and the extent of any processing;

will not be overly intrusive to you; and

will be proportionate in order to meet our legitimate interests, as above.

If applicable, we will only process 'sensitive personal data' or 'special categories of personal data' provided by you where you have provided your explicit consent to do so via a separate consent form referencing this privacy notice or where there is an alternative legal basis for such processing under Data Protection Laws.

**Your rights in relation to your personal data:** Under Data Protection Laws you have the following rights in relation to your personal data:

right to access your personal data by subject access request;

right to have your personal data rectified if inaccurate/incomplete;

right to object to direct marketing;

from 25 May 2018 in certain circumstances, the right:



to have your data erased or removed, and where the personal data has been made public, that other controllers processing the personal data also erase links to, or copy or replication of, such personal data;

to restrict the processing of your data;

of data portability, namely to obtain and reuse your data for your own purposes across different services;

to not be subjected to automated decision making (including profiling) where it produces a legal effect or a similarly significant effect on you; and

the right to bring a civil action if there is a breach of the Data Protection Laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

## If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you (eg account number, user name, registration details),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them

#### How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone: 0303 123 1113.



Up to 24 May 2018 requests for subject access to personal data may be subject to a small administration fee of up to £10, however from 25 May 2018 such requests will be administered free of charge.

If you are not happy with the way in which your personal data is held or processed by us, or if you are not satisfied with our handling of any request by you in relation to your rights, we would request that you raise a complaint with our Data Protection Officer at the contact details set out below in the first instance, however, you always have the right to complain re: data protection matters to the Information Commissioner Office (ICO). The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website.

Links to Other Website: This Privacy Notice only applies to this Website and does not apply to any links within the site linking to other websites. We ask you to read the privacy notices on other websites you visit.

#### Changes to this privacy notice

Changes to this Privacy Notice: This Privacy Notice is correct as at 13 December 2018, however we keep this Privacy Notice under regular review, and we reserve the right to change it at any time on notice to you.

We may change this privacy notice from time to time, when we do we will inform you via a notice on our website.

#### How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us please send an email to cm@bannertite.co.uk, write to Bannertite a company registered in England and Wales under number 5265032 whose registered office is at Thirsk Industrial Park, York Road, Thirsk, North Yorkshire YO7 3AA or call +44 (0) 1845 524938.