

PRIVACY POLICY



INTRODUCTION

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in our organisation.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of UK data protection laws, the data controller is Sturrock and Robson UK Limited of 4 Fitzhardinge Street, London, W1H 6EG.

DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner that ensures appropriate security.

INFORMATION YOU GIVE TO US

We may collect, use, store and transfer different kinds of personal information about you, including:

- **Identity Data**, such as your name, title, date of birth, gender,
- **Contact Data**, such as your address, email address and telephone numbers,

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- **Organisational Data**, such as your company's name, address and contact details,
- **Transaction Data**, including details about payments to and from your company, and other details of products and services your company purchases from us or supplies to us.
- **Technical Data**, including IP addresses, your log-in 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 our website,
- **Usage Data**, including information about how you use our website, products and services, and
- **Marketing Data**, such as your preferences in receiving marketing from us and our third parties, and your communication preferences.

'SPECIAL CATEGORY' DATA

- Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as 'special category' data.
- During the course of dealing with you, we do not expect to collect any 'special category' data about you.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We may obtain personal information by directly interacting with you, such as:

- placing orders for products and services,
- creating an account on our affiliate companies' website,
- participating in discussion boards or other social media functions on our website, or through our social media platforms,
- participating in any promotion or survey organised by us, or otherwise providing us with feedback,
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you, or
- corresponding with us by phone, email, letters or otherwise.

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

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We may also collect personal information about you from third parties or publicly-available sources, such as:

- analytics providers (such as Google),
- advertising networks,
- search information providers,
- providers of technical, payment and delivery services,
- business references,
- Companies House, Credit Reference Agencies, LinkedIn and the electoral register.

HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent,
- we need to perform a contract we are about to enter into, or have entered into, with you,
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

- We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will use the information you give to us	Legal basis
To register your company as a new customer	It will be necessary for our legitimate business interests, namely with a view to providing products and services to your company In certain circumstances, it may also be necessary for us to comply with a legal obligation where we are required to establish the identity of your company

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	before commencing the supply of products and services
To process your company's order and, if accepted, to deliver the products to your company (including managing payments, fees and charges)	It will be necessary for our legitimate business interests, namely with a view to providing products and services to your company
To gain export approval for products and equipment that we have agreed to supply to you	It will be necessary for our legitimate business interests, namely with a view to providing products and services to your company In certain circumstances, it may also be necessary for us to comply with a legal obligation where we are required to comply with export control regulations before commencing the supply of products and services
To obtain further information about you, your company, and the matter that is the subject of our agreement with your company	It will be necessary for our legitimate business interests, namely with a view to providing products and services to your company
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for products that you have ordered from us
To notify you about changes to our terms of sale or this privacy policy	It will be necessary for our legitimate business interests, namely to ensure you are aware of our current terms and conditions
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website. We will comply with our cookie policy when processing this information
To enable you to complete business surveys	It will be necessary for our legitimate business interests, namely to study how customers use our products, to develop them and help grow our business

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To provide you with information about special offers and other products we sell that are similar to those that you have already received from us	Where you have previously received marketing communications from us, then it will be necessary for our legitimate business interests, namely to ensure you continue to receive communications that you have previously agreed to receive In all other cases, we will only do this if you give us your consent
To invite you to corporate events, such as seminars, workshops, site visits and corporate hospitality	It will be necessary for our legitimate business interests, namely to develop our relationship with you outside of the working environment. Where you would not normally have a reasonable expectation of receiving such invites from us, we will only send you invites if you agree

We will only use your personal information for the purpose(s) 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

WHAT IF YOU CANNOT OR WILL NOT PROVIDE US WITH YOUR PERSONAL INFORMATION

It is a contractual requirement for you to provide us with certain information. This will be clearly defined within the contractual terms and conditions, and can include names, addresses, payment information. If you do not provide us with that information, we will be unable to accept and process your order and deliver the products to you. You may also be liable to pay additional costs, as explained in paragraph 6.7 of our terms of sale.

COOKIE POLICY

Our website does not use cookies to distinguish you from other users of our website.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with the parties set out below:

- other companies within our group, including Fluid Transfer International Limited, Sturrock and Robson Services Ltd, Sturrock and Robson International BV, Shand Engineering Ltd and Reach Engineering and Diving Services Ltd,
- other personnel within your company, or any other company that is party to or otherwise has a legitimate interest in the agreement between us and your company, this could include third parties,
- providers of IT and system administration services to our business,
- our professional advisers (including solicitors, bankers, auditors and insurers),
- HM Revenue & Customs, the Information Commissioner's Office, regulators and other authorities who require reporting of processing activities in certain circumstances,
- shipping and freight agents, overseas customs agencies,
- Credit Reference Agencies.
- analytics and search engine providers that assist us in the improvement and optimisation of our website, and
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us is stored on our secure servers.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

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- **Building entry controls.** Access to the building is restricted, all visitors must report to reception before entry. Beyond entry is restricted via a keypad entry system.
- **Firewalls and Encryption.** We use industry-standard and up-to-date firewall and encryption technology.
- **Overseas transfers.** Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Union, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

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 data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WE WILL STORE YOUR PERSONAL INFORMATION

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations

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Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR RIGHTS

- You have various legal rights in relation to the information you give us, or which we collect about you, as follows:
- You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your

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information for the purpose of legal proceedings or for protecting the rights of any other person.

- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact us by writing to the address at the top of this policy, or by emailing us at dataprotection@sturrockandrobson.com .

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

AUTOMATED DECISION-MAKING

We do not use automated decision-making processes.

THIRD PARTY LINKS

Our website 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.

CHANGES TO OUR POLICY

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Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email. Please check our website frequently to see any updates or changes to our policy.

CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to us by writing to the address at the top of this policy, or by emailing us at <mailto:dataprotection@sturrockandrobson.com>