

# Group Policy

## Privacy Policy

Version 2 / Date: 01/01/22

### Introduction

The Welding Alloys Group recognizes the importance of honest and responsible use of your personal information. This privacy policy explains how we collect, use and disclose personal information about you when you visit this Site and when you contact the Company, whether by e-mail, post, fax or telephone. The information you provide us may then be shared among our Group companies.

The Welding Alloys Group gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and law. This notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data. It is important to us that you are fully aware of how we use your data and that you are happy for us to do so.

The Welding Alloys Group registered office is at The Way, Fowlmere, Royston, Herts, SG8 7QS and we are a company registered in England and Wales under company number 8537181. We are registered on the Information Commissioner's Office Register of Data Controllers under registration number ZA469577. Our appointed Data Protection Officer for the organisation is David Andre and he can be contacted at [Group.dpo@welding-alloys.com](mailto:Group.dpo@welding-alloys.com).

### Information That We Collect

The Welding Alloys Group processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. This privacy statement also applies to data we hold on our suppliers. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

We may collect the following information from you:

- your full name, title and gender;
- your work and home contact details, such as address, telephone numbers and e-mail address;
- the reason for your contact, which may be a request or enquiry on your own behalf, a request or enquiry on behalf of someone else, a customer service need, providing a comment, a job application, or details in relation to a possible or existing order or service contract;
- if you create an account - your username, password, e-mail address and your full name, address and telephone numbers;
- employment and personal and educational details you choose to provide to us as part of any application for employment, such as your employee ID, including social security number, other governmental identity number, and if needed, driver's license number and/or passport number, your date of birth, place of birth, nationality (and where applicable dual or former nationality) and eligibility (including evidence) to work in the relevant country;
- financial account information, and other payment information;
- your contact and marketing preferences;
- information necessary for legal compliance;

- standard internet and website log information and details of patterns about how website visitors behave on the Site. The information we may collect includes information about your Internet service provider, your operating system, browser type, domain name, the Internet protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the website that referred you to us, the Web pages you request and the date and time of those requests.
- where you “like” us or make posts on our pages on social networking website

This information will be collected primarily from you as information voluntarily provided to us, but we may also collect it where lawful to do so from (and combine it with information from) public sources, third party service providers, individuals whom you have indicated have agreed for you to provide their personal information, government, tax or law enforcement agencies, and other third parties. We may also collect personal information about you from your use of services provided by affiliates of the Company.

## **Use of Personal Data**

The Welding Alloys Group will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw consent at any time.

The Company may use information about you for purposes described in this Policy or disclosed to you on the Site or with our services. For example, we may use information about you for the following purposes:

- to respond and/or deal with your request or enquiry;
- to process and administer your job or similar application(s) (including placement or apprenticeship opportunities, as appropriate), your order(s) or purchase(s) of our products and/or services;
- to improve our products and services and to ensure that content from the Site is presented in the most effective manner for you and for your computer (or other electronic Internet-enabled device);
- to ensure effective general business administration;;
- for internal record-keeping;
- to pay suppliers in accordance with their payment terms; operate and keep a record of supplier spending to inform current and future Company budgets;
- to contact you (directly, either by the Company or any of its affiliates, or through a partner or agent) by e-mail or phone for the above reasons;
- subject to your consent where required under applicable laws, to carry out direct marketing and/or e-mail marketing that you have requested;
- where necessary as part of any restructuring of the Company, or sale of any business or assets of the Group;
- to perform any contract, the Group has with you; and
- to respond to and defend against legal claims;
- for compliance with legal, regulatory and other governance obligations.

Some of the personal information that the Company maintains will be kept in paper files, while other personal information will be included in computerised files and electronic databases including our ERP & CRM systems.

In most cases, the information the Company processes about you is required to deal with your request or registration, or required by law, or is necessary for the exercise of the Company’s legitimate business interests and needs, in which case, special care is taken to safeguard your rights and to ensure any such use is proportionate.

The Company or one of its affiliates may also convert personal information into anonymous data and use it (normally on an aggregated statistical basis) for research and analysis to improve the performance of the Site or the services provided by the Group.

## **Legal Basis for Collecting Data**

The legal basis on which we rely to process your personal information include:

- On some occasions, we process your data with your consent (for example, when you agree that we may place cookies or process information that you input into our website).
- On other occasions, we process your data when we need to do this to fulfil a contract with you (for example, for billing purposes) or where we are required to do this by law (for example, to comply with governmental record-keeping obligations).
- We also process your data when it is in our legitimate interests to do so and when these interests are not overridden by your data protection rights (including, for example, when we share data with our affiliates).

## **Your Rights**

You have the right to access any personal information that The Welding Alloys Group processes about you and to request information about: -

- what personal data we hold about you;
- the purposes of the processing;
- the categories of personal data concerned;
- the recipients to whom the personal data has/will be disclosed;
- how long we intend to store your personal data for;
- if we did not collect the data directly from you, information about the source.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

## **Sharing Information with Third Parties**

Your personal information will be made available for the purposes mentioned above (or as otherwise notified to you from time to time), on a 'need-to-know' basis and only to management, human resources, finance, marketing, sales, IT, and other staff members who properly need to know these details for their functions within the Group. Certain individuals who will see your personal information may not be based at a Welding Alloys Site or in your country (please see below).

We may share personal information within the Group worldwide as needed for reasonable management, analysis, planning and decision making, including in relation to taking decisions regarding the expansion and promotion of our product and service offering, order or customer request fulfilment and for use by the Group for the other purposes described in this Policy.

Your personal information may also be made available to third parties (within or outside the Group) providing relevant services under contract to the Group (see below for further details), such as employment recruiters, human resources support services, credit card processors, auditors and compliance managers, IT hosting and IT maintenance providers. These third parties may use information about you to perform their functions on our behalf. The Company has put in place various security and data privacy measures, including with such third parties, in order to protect personal information and shall seek to comply with applicable legal requirements.

We may disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities, where required or permitted by law, and for tax or other purposes. Personal information may also be released to third parties in response to legal process, and when required to comply with laws, or to enforce our agreements, corporate policies, and terms of use, or to protect the rights, property or safety of the Group, our employees, agents, customers, and others, as well as to parties to whom you authorise the Company to release your personal information.

We will not sell your personal information to any third party other than as part of any restructuring of the Group or sale of any business or assets of the Group

Our Digital Channels contain links to other websites, mobile sites and apps. This privacy policy only applies to our channels. When you link to other websites, mobile sites or apps we are not responsible or liable for them. You should read the privacy policies for those linked sites or apps before you submit any personal information to them.

### **Transferring Data Abroad**

Some transfers of personal information have been explained above. Individuals within the European Economic Area ("EEA") should be aware that recipients of their personal information, within the Group or third parties (as set out in this notice), may not be located within the EEA but instead located in countries which do not have equivalent protection for personal information to that within the EEA. Steps will be taken to protect your personal information in that instance consistent with applicable law. For example, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. For further information please contact: [Group.dpo@welding-alloys.com](mailto:Group.dpo@welding-alloys.com). 2

### **Safeguarding Measures**

The Welding Alloys Group takes reasonable measures and precautions to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, loss, misuse, disclosure or destruction and have several layers of security measures in place, including: -

Centrally managed and monitored Companies' Firewalls, Endpoint Devices' Antivirus; SSL encryption on web/mail applications; Strong password policy; User Account and permission management

## Direct Marketing

The Welding Alloys Group may wish to provide you with information about new products, services, competitions, newsletters, promotions and offers, which may be of interest to you and may invite you to take part in market research or request feedback on the Group's products and services. This communication may occur by e-mail, telephone, post or SMS. We will obtain your consent and advise you of how to opt-out of receiving such communications where we are required to do so in accordance with applicable law. You have the right to modify or withdraw your consent at any time by using the opt-out/subscribe options or by contacting us directly at [Group.dpo@welding-alloys.com](mailto:Group.dpo@welding-alloys.com).

## Consequences of Not Providing Your Data

You are not obligated to provide your personal information to the Welding Alloys Group, however, as this information is required for to provide you with our services, to deliver your products. to pay our suppliers and other legitimate interests, we will not be able to offer some/all of our products or services without it.

## How Long We Keep Your Data

The Welding Alloys Group only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations.

When we store your information, we do so for as long as necessary to (i) fulfill the specific purposes for which your personal information was collected, (ii) to perform the services set out in this notice, or (iii) to comply with our legal obligations or enforce our legal rights.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

## Your Rights

You have the right to review and access your personal information held by the Company.

You also have the right to ask us to rectify, restrict processing, complete and delete your personal information, to restrict its use, and to ask us to provide it to you in a structured, commonly used and machine readable format and to transmit it directly to another organisation.

In addition, you have the right to request further information about the handling of your personal information. If you wish to do so, or to notify the Company of a change in your details, please contact [Group.dpo@welding-alloys.com](mailto:Group.dpo@welding-alloys.com).

There are exceptions to these rights, however. For example, access to personal information may be denied in some circumstances if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information. In addition, we may be able to retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your data.

If you have a question about the use of your personal information, or wish to file a complaint about it, please contact us at [Group.dpo@welding-alloys.com](mailto:Group.dpo@welding-alloys.com).

Finally, if you have unresolved concerns, you also have the right to complain to data protection authorities.

## Use of Cookies

We use cookies for certain areas of the Site. Cookies are small data files stored on your hard drive by a website. Cookies help us improve the Site and your experience. We use cookies to see which areas and features are popular and to count visits to our websites, to recognise you as a returning visitor and to tailor your experience of the Site according to your preferences. Overall, cookies help us provide you with better websites, by enabling us to monitor which pages you find useful and which you do not. We may also use cookies for targeting or advertising purposes. We may use Web beacons on the Site or in our e-mails. Web beacons are electronic images that may be used to deliver cookies, count visits, understand usage of Group websites and to tell if an e-mail has been opened and acted upon. To delete or block cookies by browser settings at any time and for more general information about cookies including the difference between session and persistent cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

We also use Google Analytics on our Site to collect information about your online activity on the Site, such as the Web pages you visit, the links you click, and the searches you conduct on the Site. We use the information to compile reports and to help us improve the Site. The cookies collect information in an anonymous form, including the number of visitors to the Site, where visitors have come to the Site from and the pages they visited. For more information about the information gathered using Google Analytics please visit <http://www.google.com/intl/en/analytics/privacyoverview.html>. You can prevent these cookies by selecting the appropriate settings on your browser. If you do this, you may not be able to use the full functionality of this Site. You may download and install the Google Analytics Opt-out Browser Add-on available here: <http://tools.google.com/dlpage/gaoptout>.

## Cookie settings

We will ask for your consent to the use of cookies set out in this Policy when you first access the Site and if we introduce any new cookies to the Site. When you first visit the Site, a box/banner will appear asking you to agree to the cookies that we set on the Site. Your continued use of the Site will be treated as consent to the use of these cookies for the purposes described.

**If you reject cookies** by clicking on "No thanks", we will not set any further cookies on your device, except that we will set the "Strictly necessary" cookies detailed above, including a cookie to remember that you don't want any cookies set when you visit the Site.

You can usually choose to set your browser to warn you when a cookie is being set or to remove or reject cookies. Each browser is different, so review your browser's Help menu to learn the correct way to modify your cookie settings. If you choose to remove or reject cookies, it will affect many features or services on the Site.

**If you agree to cookies** on the Site by clicking on the "I agree" button, we will set cookies on your device. If you wish to delete the cookies we have set on your device, please refer to your browser Help menu.

**If you do nothing** to indicate your cookie preference for the Site (in other words, if you do not click on either "I agree" or "No thanks"), we will treat this as acceptance and set cookies on your device. To modify your cookie setting, please refer to the Help menu of your browser.

## Changes to this Policy

We keep this Policy under regular review. We may change this Policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices.

## Contact Details

If you have any questions about this Privacy Policy, please contact us at: [Group.dpo@welding-alloys.com](mailto:Group.dpo@welding-alloys.com).