

Erodex UK Ltd are committed to ensuring the security and protection of personal information that we process. We endeavour to treat personal and confidential information with equal care and respect. Erodex UK Ltd has reviewed its privacy policy on how we gather, store and handle data. Some of the key points of Erodex UK Ltd privacy policy are:

We are (Erodex UK Ltd), collect information about you when you buy or use any of services. We may share this information between Erodex UK Ltd, so we can provide the services you order and manage your account. By using any of our services or visiting any of our websites you agree to our use of your information as set out in this policy. This policy forms part of and should be read in conjunction with the terms and conditions and data and retention policy on our website and any terms we provide within relation to our services.

We will be the “controller” of the personal information which you provide to us or which we collect from you.

### 1. PERSONAL INFORMATION THAT WE COLLECT

We collect a range of personal information relating to you, including your:

- name
- email address
- telephone number
- bank account details
- delivery and billing address
- any other personal information that you may choose to provide when you contact us.

### 2. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information as follows:

- to maintain our relationship with you whilst you are a customer
- to process orders and provide agreed goods and services to you
- for invoicing, processing payments, account set up and maintenance, to communicate with you, including to respond to information requests/enquiries submitted and/or to obtain your feedback on our products and services
- for record keeping, statistical analysis and internal reporting
- to notify you about changes to our products and services; to decide on and notify you about price changes
- to monitor the quality of our products and services
- for logistical purposes, including to plan and log delivery routes
- to investigate any complaint, you make; to provide evidence in any dispute or anticipated dispute between you and us
- to obtain credit references, credit checks and for debt collection, fraud detection and prevention and risk management purposes
- and to protect the rights, property, and/or safety of Erodex UK Ltd, its personnel and others.

## Marketing

We may send you direct marketing in relation to our own products and services by phone, email and post, if this is in line with any marketing preferences that you have provided to us.

**We will only send you direct marketing in relation to our own products and services by email:**

- where you have consented to this; or
- where you have not objected to this, and we are marketing related products and services to those which were the subject of a previous sale or negotiations of a sale to you.

You can choose to opt out of receiving direct marketing information from us at any time by contacting us via the following methods:

- by mail – Erodex UK Ltd, Unit 6 Tipper Trading Estate, Park Road, Halesowen, B63 2RH
- by email – [gdpr@erodex.com](mailto:gdpr@erodex.com)
- by telephone – 01384 892011
- Or using the contact us form on our website

## 3. LEGAL BASIS FOR PROCESSING

In terms of the legal bases we rely on to process your personal information, these are as follows:

- where you have provided your consent: for direct marketing communications in respect of our own products and services, including in respect of marketing communications sent by electronic means (e.g. email);
- for the performance of a contract with you (such as a contract for the provision of good and services) or to
- take steps at your request prior to entering into this contract;
- to comply with legal obligations, including in relation to health and safety and environmental legislation, performing anti- money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation;
- to protect your vital interests or the vital interests of another person, e.g. where you or they are seriously injured or ill, or
- for our legitimate interests in:
- management of your account (including processing payments) and our relationship with you, and communicating with you;
- operating our Website;
- sending direct marketing in respect of our own products and services where you have not provided your consent and the marketing communication is sent by non-electronic means (e.g. post or telephone); processing orders and supplying our products and services; and
- our internal business purposes which may include processing for the purposes of: record keeping, research, reporting and statistics, data security, to ensure the quality of our products and services, investigating and responding to queries and complaints, obtaining credit references and credit checks, providing payment performance data to credit reference agencies, changing our pricing, debt collection, fraud detection and prevention, risk management, recruitment and training of our personnel, and protecting our rights, property and safety (and that of others). You can object to processing carried out on the basis of our legitimate interests at any time by emailing [GDPR@Erodex.com](mailto:GDPR@Erodex.com). See also “Your Rights – The right to object”.

## 4. HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information with:

- third party providers in order for us to process payments that are due to us, in doing so we provide bank card details to such providers;
- licensed credit reference agencies, debt collection agencies and lawyers when we carry out credit checks, to report on your payment performance and/or or seek to recover debts due to us;
- our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;
- emergency services in the event that we need to report accidents or incidents or request emergency assistance;
- any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety; or in order to protect the rights, property, or safety of Erodex UK Ltd, its employees or others;
- investors and other relevant third parties in the event of an actual or potential sale or other corporate transaction related to Erodex UK Ltd limited
- any other third parties, if authorised by you to do so.

## 5. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We retain your personal information for no longer than is necessary for the purposes for which the personal information is collected. When determining the relevant retention periods, we will take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes, and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

Please see our Data and Retention Policy on our website for specific data type retention.

## 6. LINKS TO THIRD PARTY WEBSITES

Our websites currently contain links to other Internet websites such as our suppliers, our own social media pages and other divisions of Erodex UK Ltd.

## 7. SECURITY

Erodex UK Ltd takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure to protect and secure the personal data that we process. We have security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several types of security measures such as SSL, door access controls, enforced password policy, encryption, less privileged access controls and carry out regular security audits and reviews.

Please note that whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, no transmission over the Internet can be guaranteed to be secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer to us over the Internet.

## 8. DATA BREACH ACTION

Erodex will take all the necessary steps to prevent a data breach from occurring, however should a data breach take place, the process of removing all access to that resource will begin.

A Director will chair an incident response team to handle the breach or exposure.

The team will include members from:

- IT Infrastructure
- Finance (if applicable)
- Legal
- Communications
- Human Resources
- The affected unit or department that uses the involved system or output or whose data may have been breached or exposed
- Additional departments based on the data type involved, Additional individuals as deemed necessary by the Director

The Director will be notified of the theft, breach or exposure. IT, along with the designated forensic team, will analyse the breach or exposure to determine the root cause.

### Work with Forensic Investigators:

As provided by Erodex Ltd cyber insurance, the insurer will need to provide access to forensic investigators and experts that will determine how the breach or exposure occurred; the types of data involved; the number of internal/external individuals and/or organizations impacted; and analyse the breach or exposure to determine the root cause.

### Develop a communication plan:

Work with Erodex Ltd communications, legal and human resource departments to decide how to communicate the breach to: a) internal employees, b) the public, and c) those directly affected.

## 9. YOUR RIGHTS

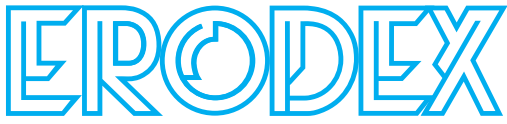
The following section explains your rights. The various rights are not absolute, and each is subject to certain exceptions or qualifications.

We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

- The right to be informed- You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. This is why we're providing you with the information in this Privacy Statement.
- The right of access- You have the right to obtain a copy of your personal information (if we're processing it), and other certain information (similar to that provided in this Privacy Statement) about how it is used. This is so you're aware and can check that we're using your personal information in accordance with data protection law. We can refuse to provide information where to do so may reveal personal information about another person or would otherwise negatively impact another person's rights.
- The right to rectification- You can ask us to take reasonable measures to correct your personal information if it's inaccurate or incomplete. E.g. if we have the wrong email or name for you.
- The right to erasure- This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal information where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use the information in defence of a legal claim.
- The right to restrict processing- You have rights to 'block' or suppress further use of your personal information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your personal information, but may not use it further. We keep lists of people who have asked for further use of their personal information to be 'blocked' to make sure the restriction is respected in future.
- The right to data portability- You have rights to obtain and reuse certain personal information for your own purposes across different organisations. This enables you to move, copy or transfer your personal information easily between our IT systems and theirs (or directly to yourself) safely and securely, without affecting its usability. This only applies to your personal information that you have provided to us that we are processing with your consent or to perform a contract which you are a party to (such as pay and compensation services), which is being processed by automated means.
- The right to object- You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time insofar as that processing takes place for the purposes of legitimate interests pursued by Erodex UK Ltd or by a third party. We will be allowed to continue to process the personal information if we can demonstrate "compelling legitimate grounds for the processing which override [your] interests, rights and freedoms" or we need this for the establishment, exercise or defence of legal claims.
- Rights in relation to automated decision making and profiling- You have the right not to be subject to a decision based solely on automated processing (including profiling), which significantly affects you, subject to some exceptions. Where this is the case, you have the right to obtain human intervention, voice your concerns and to have the decision reviewed.

## 10. CONTACT US

Erodex UK Ltd have appointed a data privacy team to provide readiness to our staff and to implement the new policies, procedures and measures. Erodex UK Ltd understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR.



THE LEADING EDGE

If you want to update your marketing preferences, amend information or feel we have breached your privacy please email [GDPR@erodex.com](mailto:GDPR@erodex.com), call 01384 892011 or write to us at:

Erodex UK Ltd  
Unit 6 Tipper Trading Estate  
Park Road  
Halesowen  
West Midlands  
B63 2RH

We will generally respond to your request within one month of receipt of your request.

We will not charge you for such communications or actions we take, unless:

- you request additional copies of your personal data undergoing processing, in which case we may charge for our reasonable administrative costs, or
- you submit manifestly unfounded or excessive requests, in particular because of their repetitive character, in which case we may either: (a) charge for our reasonable administrative costs; or (b) refuse to act on the request.

If after contacting Erodex UK Ltd and if you are still unhappy you may also complain to the Information Commissioner, all contact details are available on the Information Commissioner 's Website.