

Privacy Notice – Customers

Simmal Ltd takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact privacy@simmal.com.

Our personal data policy has been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

What information do we collect?

We collect and process personal data about you when you interact with us and our products and when you purchase goods and services from us. The personal data we process includes:-

- Contact information (including names, business names, phone numbers, e-mail address, job titles and any information you provide through linking social media profiles to communications with us)
- Shipping information for delivery of the products you purchase from us
- Billing information (including bank and/or credit/debit card information)
- Transactional information (including historical data about your purchases from us)
- Information about visits to our websites (including what web browser you use, your IP address, your device and its operating system, what pages you view on our websites and how often you visit our websites)

How do we use this information and what is the legal basis for this use?

We process the personal data listed above for the following purposes:-

- a) To perform a contract (to perform our contractual obligations to you) by:-
 - processing the orders that you place with us for goods and services;
 - processing your payments to us;
 - notifying you about the status of your purchases;
 - notifying you about any product exchange, quarantine or recall that may be required following our supply of product to you.
- b) Based on our legitimate interests to:
 - provide customised and optimised enquiry, quotation and website experiences for you so that you are better able to search for and browse our products, request quotations and place orders with us;
 - improve the performance and usability of our systems and websites;
 - monitor, maintain and improve the security and integrity of our systems;
 - inform our suppliers about who is purchasing the products they manufacture;
 - review geographical location data (delivery, billing and IP addresses) for purposes of understanding where our customers are based to improve service;
 - maintain a record of customers who have purchased from us for as long as we determine is reasonably necessary to operate our business efficiently by balancing the risks of long-term storage of personal data against the costs of deleting personal data which may be useful for efficiently conducting future business;

- maintain records of materials and products for quality traceability and certification purposes;
- check the validity of the sort codes, account numbers and card numbers you submit (where you provide a credit or debit card, via third party POS payment providers) in order to prevent fraud;
- respond (with your express consent) to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services;
- understand the effectiveness of our advertising and marketing;
- keep accurate financial records for accounting and audit purposes;
- invite you to take part in market research or surveys;
- comply with our legal and regulatory obligations.

We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

- c) With your consent, which you may provide by e-mail to us, when you call our offices or mobile devices, upon registering or logging in to our websites or during the course of other business interactions through which we obtain your affirmative consent (e.g. at events or when you choose to download information we make available to you, we process your personal data for the purposes of:-
- distributing relevant marketing materials to you through e-mail, postal mail, SMS, social media and marketing to you over the phone;
 - operating internet remarketing programs (such as Google AdWords) through which “cookies” are used to display ads for our products to you on other websites you visit based on the products and pages you viewed on our websites.

With whom and where will we share your personal data?

We may share your personal data with the below third parties:

- package and product delivery services;
- our suppliers, business partners and sub-contractors;
- marketing and communications agencies where they have agreed to process your personal data in line with the General Data Protection Regulation (in force from 25 May 2018) and applicable national law;
- search engine and web analytics companies;
- data cleansing and supplementing services;
- our professional advisors such as our auditors and external legal and financial advisors;
- government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws;
- providers of website and/or I.T. hosting, maintenance, call centre operation and identity checking.

These sub-contractors are not authorised by us to use or disclose your personal data except as necessary to provide services for Simmal.

How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a prospective customer we will only retain your data (a) where you have expressly consented to us contacting you until you unsubscribe from our communications; or (b) if you have not subscribed, while you interact with us and our content and up to 12 months from when you last interacted with us or our content.

Where you are a customer who (a) has placed an enquiry with us, we will retain your data for the time it takes to process the enquiry up to a period of 12 months from receipt of your request; or (b) has purchased from us, we will keep your information for (a) as long as we determine is reasonably necessary to operate our business efficiently by balancing the risks of long-term storage of personal data against the costs of deleting personal data which may be useful for efficiently conducting future business.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require Simmal to hold certain information for specific periods other than those listed above.

Where is my data stored?

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place. Further information may be obtained from our Privacy Team.

What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

If you are not happy with our response, you can contact the Information Commissioner's Office <https://ico.org.uk>.