

## Privacy Notice Sales and Marketing

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our customers and website visitors.
- 1.2 This privacy notice applies where we are acting as a data controller with respect to the personal data of our existing and prospective customers and our website visitors; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We will ask you to consent to our use of cookies in accordance with the terms of this notice when you first visit our website.
- 1.4 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications. You can access the privacy controls by linking to <https://en.webtec.com/GDPR.aspx>.
- 1.5 In this notice, “we”, “us” and “our” refer to Webtec Products Limited. For more information about us, see Section 13.

### 2. Personal information

- 2.1 Personal information is information that identifies you as an individual or from which you can be identified.

### 3. How we use your personal data

- 3.1 You may provide or we may collect data from you at a number of points, including when you:
  - complete a form on one of our web pages, for example, when you request information via our website
  - submit a ‘service return’ form
  - request a quotation by telephone or email
  - place an order for our products by telephone or email
  - apply for a credit account with us
  - complete an information request form at an exhibition, seminar, or conference.This data may include your name, job title, address, telephone number, email address, Skype™ address, social media address and product interests.
- 3.2 We may process data about your use of our website and services (“usage data”). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is via our Marketing Automation System, and Google Analytics (see section 11). This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is legitimate interest for existing and prospective customers and consent for web visitors based on subscribing to our email campaigns and/or accessing information such as downloadable files and/or attending webinars.
- 3.3 We may process your data (“personal data”). These data may include your name, email address, employer, address, etc. The source of the data is you or your employer. The account data may be processed for the purposes of operating our website, providing our products and services, ensuring the security of our website, maintaining back-ups of our databases, and communicating with you. The legal basis for this processing is either consent or legitimate interest.
- 3.4 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for any compliance with a legal obligation to which we are subject.

### 4. Providing your personal data to others

- 4.1 We work closely with our distributors around the world and where we believe it is appropriate that an enquiry you have made is handled by our distributor, we may share your personal data related to the enquiry with our distributor.

- 4.2 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. Retaining and deleting personal data**

- 5.1 This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will retain your personal data for email and web marketing purposes until you unsubscribe when you will immediately cease to receive email communications and your data will be archived. All your personal data will then be deleted from our email marketing database, typically within a few months but no longer than 12 months after you unsubscribe.  
We will retain your personal data relating to business transactions, such as information requests, quotations and orders from your company until we are informed that you are no longer to be contacted or you have left the company, ie: you are no longer active with this company. All your personal data will then be anonymized within our customer relationship management database, typically within a few months but no longer than 12 months after we are informed.
- 5.4 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Security**

- 6.1 Your data will be held by Webtec but, as Webtec markets and sells its products and services world-wide through subsidiaries, associated companies, representative offices, distributors and agents (defined as "Webtec Group"), in order to fulfil the Purposes, we may need to pass your information to other members of the Webtec Group, which may be based outside the European Economic Area ("EEA").
- 6.2 We may also need to pass your data (though not necessarily your personal data) to one of our carefully selected third parties, including business partners, suppliers or sub-contractors ("Third Parties"), in order to fulfil the Purposes, such as for the processing of your payment details, assessing your credit rating where you open a credit account with us to make your purchase, or the provision of product support services. These Third Parties may also be based or operate outside the EEA.
- 6.3 By submitting your data to us, you agree that it may be transferred to the relevant members of the Webtec Group and/or to our Third Parties, and that it may be stored, accessed and used by them. We will take all reasonable steps necessary to ensure that your data is treated securely in accordance with our security policy and in accordance with this privacy notice.  
We will not otherwise transfer or disclose your data except with your consent, where we are required or permitted to do so by law, or to any successors in title to our business.

## **7. Amendments**

- 7.1 We may update this notice from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this notice.

## **8. Your rights**

- 8.1 You may instruct us to provide you with any personal information we hold about you and you have the right to modify these data or to have your data forgotten. This can be accomplished by either:
- (a) visiting your My Profile page and entering and verifying your email address registered with us. You can subsequently access the personal data held on our site by following the time-limited link included in the email that we send back to your registered email address.
  - (b) contacting Webtec in writing either by email or post at the address specified in section 13. Webtec will endeavor to action your request within one month.
- 8.2 You may instruct us at any time not to process your personal information for marketing purposes by unsubscribing via the My Profile page.
- 8.3 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes via our double-opt in process, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes by clicking on the 'unsubscribe' link at the bottom of all email communication.

## **9. About cookies**

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

- 9.2 Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 10. Cookies that we use

- 10.1 We use cookies for the following purposes:
- (a) authentication - we use cookies to identify you when you visit our website.
  - (b) security and status – in the future, we will use cookies to help us to determine if you are logged into our website as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.
  - (c) personalisation - we use cookies to help us align information about your preferences and to personalise information on our website and in our emails for you.
  - (d) analysis - we use cookies to help us to analyse the use and performance of our website and services.
  - (e) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

## 11. Cookies used by our service providers

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 11.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: <https://www.google.com/policies/privacy/>.

## 12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
  - (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
  - (e) <https://support.apple.com/kb/PH21411> (Safari); and
  - (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
- 12.2 Blocking all cookies will have a negative impact upon the usability of our web site and you will not be able to use all the features on our website.

## 13. Our details

- 13.1 Webtec’s website is owned and operated by Webtec Products Limited on behalf of all Webtec Group companies
- 13.2 We are registered in England and Wales under registration number 832125 and our registered office and principal place of business is at Nuffield Road, St. Ives, Cambridgeshire, PE27 3LZ, UK.
- 13.3 You can contact us via any of our offices using the details provided on our contact page at [www.webtec.com/contact/](http://www.webtec.com/contact/)