



GENERAL DATA PROTECTION REGULATIONS

BIGNEAT GROUP PRIVACY POLICY

1. ABOUT THIS POLICY

- i. We thank you for the interest shown in our products and services. You may have initially visited our websites and requested product brochures, technical data or other information and in doing so will have voluntarily given us some personal information about yourself. Your privacy is very important to us and we want you to feel comfortable with how we will use and share your personal information.
- ii. Unless we make it absolutely clear otherwise, our policy is not to obtain any sensitive personal data.
- iii. This policy sets out how the Bigneat group companies that are based in the UK handle your personal information, including when and why it is collected, used and disclosed and how it is kept secure.
- iv. You will find our contact details at the end of this policy which you can use if you have any questions, including how to update or access your personal information or to make a complaint.
- v. This policy may change, so please check this page from time to time to ensure that you're happy with any changes. Please see "Changes to this policy" in Section 12.

2. WHO WE ARE

- i. Bigneat Group in the UK is made up of individual companies, all of whom operate autonomously as business-to-business organisations. For a list of these companies, please refer to Section 11. Whenever you deal with one of these companies, the 'data protection controller' of your personal information will be the company in our group that you are interacting with or with whom your information has been shared. A 'data protection controller' is a company that decides why and how your personal information is processed.
- ii. Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to the particular company that is the controller of your personal information.

3. HOW AND WHAT PERSONAL INFORMATION WE COLLECT

- i. We may collect and process the following personal information about you:

Personal information you give to us:

This is information about you that you voluntarily give to us by entering information via our websites or our social media pages or by corresponding with



us by phone, email or otherwise. This includes your name, contact details (phone number, email address and address) and enquiry details.

Personal information we collect about you:

We may automatically collect the following personal information: details of your browser and operating system stored by our web servers, the website from which you visit our website, the pages that you visit on our website, the date of your visit, and, for security reasons, e.g. to identify attacks on our website, the Internet protocol (IP) address assigned to you by your internet service. We collect some of this information using 'cookies'-(cookies are small pieces of information sent to your device and stored on its hard drive to allow our websites to recognise you when you visit, and to track you as you move through the site). We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.

Personal information we may receive from other sources:

We may obtain certain personal information about you from sources outside our business which can include Bigneat Limited companies (Section 11) or other third party companies; the personal information received is as described in the two paragraphs above.

- ii. Please see further "How we use your personal information" in Section 4 for details of the purposes for which we use the personal information we obtain from these sources and the legal basis on which we rely to process that information. The remaining provisions of this policy also apply to any personal information we obtain from these sources.

4. HOW WE USE YOUR PERSONAL INFORMATION

i. Where you have provided CONSENT

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- to share your personal information with our authorised distributors to arrange quotations or where you have requested a call back;
 - to supply brochures and other technical material you have specifically requested from us;
 - to contact you via email, text message, post or telephone with marketing information about Bigneat Limited products and services (see Marketing section below for further details);
- ii. You may withdraw your consent for us to use your information in any of these ways at any time. Please see Withdrawing your consent in Section 8.iv for further details.



iii. Where required to perform a CONTRACT with you

We may use and process your personal information where it is necessary for the performance of a **contract with you** or in order to take steps at your request before entering into a contract with you including for the following purposes:

- To exchange information for servicing/maintenance/warranty;
- If you take our 7 year warranty cover (you will have entered into a separate agreement for this)

iv. Where it is in your VITAL INTEREST

- We may use your personal information to contact you if there is an urgent safety notice or product recall to communicate to you or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your vital interests for us to use your personal information in this particular way.

v. Where required to comply with our LEGAL OBLIGATIONS

- We will use your personal information to comply with our legal obligations including: a) to assist HMRC, the Police, or any other Public Authority or criminal investigation body; b) to identify you when you contact us; and c) to verify the accuracy of data that we hold about you.

vi. Where there is a LEGITIMATE INTEREST

We may use and process your personal information where it is entirely necessary for us to pursue our **legitimate interests** as a business for the following purposes:

- for the prevention of fraud and other criminal activities;
- to correspond and communicate with you;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression register in order to be able to comply with your request);
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; and;
- for general administration including managing your queries, complaints, or claims, and to send service messages to you.



5. OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION

i. Group companies

We may share your information with other companies within the Bigneat Limited group. They may use your personal information in the ways set out in "How we use your personal information" in Section 4, in connection with products and services that complement our own range of products and services. Please refer to Section 11 for the details of our group companies with whom we may share your personal information.

ii. Our service providers

We may disclose your information to our third party agents, e.g. shipping and transport agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud services providers (such as hosting and email management) or administrative services.

When we use third party providers, we will only disclose to them any personal information that is entirely necessary for them to provide their service.

iii. Authorised distributors in our network

We may share your information with other companies within our Authorised Distributor Network. They may use your personal information in the ways set out in "How we use your personal information" in Section 4 or in connection with products and services that are distributed within your geographical region.

6. WHERE WE STORE YOUR PERSONAL INFORMATION OUTSIDE THE EEA

- i.** All information you provide to us may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen where our subsidiary company Bigneat North America which is incorporated in a country outside of the EEA. Other countries may not have similar data protection laws to the UK.
- ii.** If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information to ensure adequate protection. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.
- iii.** If you use our services whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.
- iv.** Any personal data that is provided to us is stored on our secure servers and/or those of the service provider hosting our site on our behalf.



7. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

- i. If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.
- ii. We do not retain personal information in an identifiable format for longer than is necessary.
- iii. We may need your personal information to establish, bring or defend legal claims, in which case we will retain your personal information for 7 years after the last occasion on which we have used your personal information in one of the ways specified in "How we use your personal information" in Section 4.
- iv. The only exceptions to this are where:
 - the law requires us to hold your personal information for a longer period, or delete it sooner;
 - you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted in this section 7, or because we are required under the law (see further Erasing your personal information or restricting its processing in Section 8.(vi)); and
 - in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

8. YOUR DATA SUBJECT RIGHTS

i. **Your 'data subject' rights:**

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where no such information is required, after we have received your request.

ii. **Accessing your personal information**

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this also concerns other individuals or we have another lawful reason to withhold that information.

iii. **Correcting and updating your personal information**

The accuracy of your information is important to us and we will review and correct the information that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us as described at the end of this policy.



iv. **Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, as set out under “How we use your personal information” in Section 4, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can also do so by clicking on the “unsubscribe” tool at the end of any e-mail, or by contacting us using the details at the end of this policy. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

v. **Objecting to our use of your personal information and automated decisions made about you.**

Where we rely on our legitimate business interests as the legal basis for processing your personal information for any purpose(s), as out under “How we use your personal information” in Section 4, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request.

You may also contest a decision made about you based on automated processing by contacting the data protection co-ordinator.

vi. **Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request. However, your personal information may be converted to entry on a secure “unsubscribe register” to enable us to contact you where it is of “vital interest”. See section 4(iv).

You may also ask us to **restrict processing** your personal information in the following situations:

- where you believe it is unlawful for us to do so,
- you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.

In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do



so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

vii. Transferring your personal information in a structured data file

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under Section 4 “How we use your personal information”, you may ask us to provide you with a copy of that information in a structured data file.

We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

viii. Complaining to the UK data protection regulator

You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the [ICO's website](#) for further details.

9. SECURITY / COOKIES / LINKS / SOCIAL PLUGINS

i. Security measures we put in place to protect your personal information

All companies within the Bigneat Limited group use technical and organisational security measures to protect the personal information supplied by you and managed by us against manipulation, loss, destruction, and access by third parties. We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. Unfortunately, the transmission of information via the internet is not always completely secure and although we will do our best to protect your personal information, we cannot guarantee the security of your information whilst in transit to our website and any transmission is at your own risk.

ii. Links to other websites

Our website may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites and Apps, so we encourage you to read their privacy statements. We are not responsible for the privacy policies and practices of other websites and Apps (even if you access those using links that we provide) and we provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.



iii. Social plugins

We use so-called social plugins (buttons) of social networks such as Facebook, Google+ and Twitter.

When you visit our websites, these buttons are deactivated by default, i.e. without your intervention they will not send any data to the respective social networks. Before you are able to use these buttons, you must activate them by clicking on them. They then remain active until you deactivate them again or delete your cookies.

After their activation, a direct link to the server of the respective social network is established. The contents of the button are then transmitted from the social network directly to your browser and incorporated in the website.

After activation of a button, the social network can retrieve data, independently of whether you interact with the button or not. If you are logged on to a social network, the network can assign your visit to the website to your user account. A social network cannot assign a visit to websites operated by our other group companies unless and until you activate the respective button there as well.

If you are a member of a social network and do not wish it to combine data retrieved from your visit to our websites with your membership data, you must log out from the social network concerned before activating the buttons.

We have no influence on the scope of data that is collected by the social networks through their buttons. The data use policies of the social networks provide information on the purpose and extent of the data that they collect, how this data is processed and used, the rights available to you and the settings that you can use to protect your privacy.

10. MARKETING

- i. We may collect your preferences to send you marketing information directly from us by email/SMS (where applicable) including:
 - if you request a quotation, technical information, newsletter or request a call back using online selection, you will, by pressing the “submit” buttons have essentially consented to receiving such information directly from us; however, your data protection outlined in this policy still applies.
- ii. If you opt-in to receiving marketing from our recommended third parties, you will receive marketing from the third parties listed in the table below via your preferred communication methods indicated by you:
- iii. From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you consent to continue receiving marketing information from us.
- iv. You have the right to opt-out of our use of your personal information to provide marketing to you in any of the ways mentioned above. Please see “Withdrawing your Consent” in Section 8.(iv) and Objecting to our use of your personal



information and automated decisions made about you in Section 8.v above for further details on how you can do this.

11. GROUP COMPANIES

Our group of business-to-business companies are:

Bigneat Limited
Solent Manufacturing
EFCO Furnaces
Bigneat North America LLC

12. CHANGES TO THIS POLICY

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our website and/or by contacting you by email. Any changes will take effect 7 days after the date of our email or the date, on which we post the modified terms on our website, whichever is the earlier. We recommend you regularly check for changes and review this policy when you visit our website. If you do not agree with any aspect of the updated policy, you must promptly notify us and cease using our services.

13. CONTACT US

If you have any questions, or believe that any of your information held by a Bigneat company is incorrect, incomplete, being processed incorrectly or wish to amend your marketing preferences, please contact the Bigneat Data Protection Co-ordinator as soon as possible and we will delete, restrict, update or cease to process any information, subject to the terms provided for by the law.

Bigneat Ltd
Data Protection Co-ordinator
4/5 Pipers Wood Industrial Park
Waterberry Drive, Waterlooville
Hampshire PO7 7XU
E-mail: admin@bigneat.co.uk

Signed

A handwritten signature in blue ink, appearing to be 'R Monks', written over a faint blue line.

Robert Monks
Managing Director
11.05.2018