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Introduction

Welcome to the SFS Group Fastening Technology Limited's privacy policy.

1. Important information and who we are

This privacy policy sets out how we use personal data about you. We are committed to protecting your personal data which includes letting you know how we use it and telling you about your rights.

SFS Group Fastening Technology Limited is a company registered in England and Wales under company number 01737942. Our head office address is 153 Kirkstall Road, Leeds, LS4 2AT.

SFS Group Fastening Technology Limited has 2 trading names (in addition to 'SFS Group Fastening Technology Limited') which are Gesipa and NVELOPE.

This privacy policy is issued on behalf of SFS Group Fastening Technology Limited and applies to all of the above trading names and so when we mention "our website" we are referring to the website of the relevant trading name as applicable. When we refer to "SFS", "we", "us" or "our" in this privacy policy, we are referring to SFS Group Fastening Technology Limited.

Some of our operations are supported by website servers and storage systems which are hosted and maintained by our parent company, SFS Group AG, a company incorporated Switzerland. In relation to the personal data we collect, store and process we are the data controller and SFS Group AG, where it processes this personal data on our instruction, is the data processor. In certain circumstances SFS Group AG is a joint controller of this personal data for example, when SFS Group AG is determining the type of data processing in order to maintain the systems we share. Where SFS Group AG is the data controller, SFS Group AG's privacy policy will apply and this can be found at <https://www.sfs.com/ch/en/data-privacy/>.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware

of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

We have appointed a data privacy contact who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy contact using the details set out in the Contact us section.

Our website is not intended for children and we do not knowingly collect data relating to children.

2. Contact us

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy contact in the following ways:

Name: Ian Whitehouse

Full name of legal entity: SFS Group Fastening Technology Limited

Email address: gb_privacy@sfs.com

Postal address: SFS Group Fastening Technology Limited, 153 Kirkstall Road, Leeds, LS4 2AT

Telephone number: 0330 0555 888

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 11/11/21. Historic versions can be obtained by contacting us. We may make changes to this privacy policy at any time. You can always access the most up to date version by clicking on a link to the privacy policy on our website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

4. Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and

are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

5. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Business Details** includes the company name, address and telephone number. Where you are a sole trader this may be your name or trading name and residential address and telephone number where an alternative address and telephone number for the business has not been given. Where you are a partnership this may be the partnership name and the residential addresses and telephone numbers of the partners where an alternative address and telephone number for the partnership has not been given.
- **Credit Facilities Application Data** includes name(s) of company / sole trader / partners and their / its address(es), telephone number and fax number. Also any key contact name and email address and delivery contact name, position and email address and/or telephone number, banker's name and address, price list recipient name, company registration number, VAT number and website address, position of signatory, names, addresses, telephone numbers and email addresses of trade references.
- **CPD Details** includes name, email, telephone number, job role/type and business address of individual attendee, record of the attendee's completion of and attendance at CPD training and the attendee's feedback.
- **Delivery Notes and Labels** includes delivery address, recipient name and confirmation of delivery time and date.
- **Due Diligence Details** includes customer credit reports and identity documents such as copies of passports for sole traders, partners or directors. Where you are a sole trader or partnership a credit report will be in

the name of the sole trader or names of the partners. Where you are a limited company this report will be in the name of the company and its directors.

- **ePortal Details** includes password, login and purchases or orders made by you.
- **Financial Data** includes bank account and payment card details.
- **Invoices** includes customer name, date of order, product ordered and price of product ordered including VAT and amount of any discounts applied.
- **Key Business Contacts** includes key employee's name, salutation, work address, work telephone number, work email, department, role type, job title, notes (e.g. when last contact was made) and business industry. This does not include an individual's hobbies or interests.
- **Marketing Preferences** includes your preferences in receiving marketing from us and your communication preferences.
- **Order Details** includes detail about orders made, this includes customer name, key contact email, date of order, product details, delivery address, price of product ordered including VAT and amount of any discounts applied, payment date / outstanding and notes for delivery (i.e. instructions for delivery).
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Transaction Data** includes details about payments to and from you including payment amount and date, card authorisation number and transaction reference.
- **Visitor Details** includes name and email address of individuals visiting our premises along with the company name at which that individual is employed, the name of the SFS individual visited and time in and time out.
- **Warranty Registration Details** includes customer name, address, telephone number, email address, details of the product, the date of the order and installation and details of the distributor who sold you the product. This includes information about customers who did not buy products directly from us.

Aggregated data. We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Technical Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Special categories. We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union

membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

6. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for

example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

7. How is your personal data collected?

We may collect personal data about you in several ways including through:

- **Direct interactions.** You may give us your Business Details, Key Business Contacts, ePortal Details, and/or Marketing Preferences by filling in forms or by corresponding with us via our website or by phone, email or otherwise. This includes personal data you provide when you:
 - fill in a contact us form or similar on our website;
 - telephone or email us with a query;
 - interact with and use our ePortal;
 - subscribe to our newsletter or marketing materials, when we will also collect your Marketing Preferences;
 - fill in a Credit Facilities application form, in which case we will collect the Credit Facilities Application Data as applicable;
 - correspond with us via social media including Twitter and LinkedIn (for the purpose of responding to a specific message or request only);
 - place an order with us, in which case we will hold Order Details;
 - provide feedback or complain to us; or
 - registering a warranty or making a warranty claim.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see the [Cookie section](#) below for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks such as Barbour ABI based in the UK but who may transfer or store data in EU or non-EU countries; and
 - (c) search information providers who may be based inside or outside the EU.
 - Financial Data, Credit Scoring Data and Transaction Data from providers of technical, payment and delivery services who may be based inside or outside the EU.
 - Business Data and Due Diligence Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
 - **Social Media.** Where you interact with our social media pages in the capacity of working within a business, for example by following our LinkedIn page or liking one of our posts, we sometimes use Business Details and Key Business Contacts received via that social media platform to check whether you are a new business customer. Where you are a potential new business customer we may get in touch via that social

media platform to ask if you are happy for us to use your Business Details and Key Business Contacts for our other marketing activities. For example we may message you on LinkedIn asking if you would like to receive our newsletters via email. Further details about our marketing activities can be found at the section below explaining the [purposes for which we will use your personal data](#). Where you are an existing customer we may include information about your social media interactions with us on our CRM system.

8. Purposes for which we will use your personal data

We will use your personal data when the law allows us to. We will use your personal data in the following circumstances:

- **Due diligence checks.** We may carry out due diligence checks which are necessary for our legitimate interests to make business decisions such as deciding credit limits for customers. This data includes Business Details, Due Diligence Details and Credit Facilities Application Data and may include personal data relating to individuals involved in that business.
- **ePortal.** We use your ePortal Details in our legitimate interests to provide you with a high level of customer service to allow you to obtain order status, track and trace your shipments, obtain proof of delivery, print copies of invoices, acknowledgements, price lists and packing lists and create and download reports via our website ePortal.
- **Feedback.** We use your CPD Details for the purpose of obtaining feedback in relation to the provision of CPD training. We use this in our legitimate business interests to provide a high level of customer service to you.
- **Marketing.** We sometimes carry out direct marketing activities to businesses but not to consumers. Some of this marketing does not involve the use of personal data (for example sending marketing by post to the registered office of a company, or email marketing to an email address which is not associated with a specific individual such as "info@...". We may also carry out more personalised marketing using personal data such as Business Details, Key Business Contacts and Marketing Preferences as appropriate. We carry out marketing activities for our legitimate interests to identify potential new business customers and to grow and promote our business to existing business customers and prospective business customers. We may also carry out direct marketing activities to you where you have provided your specific consent for us to do this, for example by signing up to our newsletter online, by providing your contact details to us at an exhibition or show or by indicating you wish to receive a follow up in any feedback you give us. When we send marketing by email, from update@uk.sfs.com, we include an unsubscribe link.

If you do not wish to receive further marketing from us please let us know by contacting us using the details in the Contact us section or by clicking the unsubscribe link at the bottom of one of our emails.

- **Ordering a product or requesting a service.** Where you place an order for a product or request a service from us we will use your personal data to fulfil our contractual obligations to you. This may include Business Details, Delivery Notes and Labels, Invoices, Order Details and Transaction Details as applicable. We also hold some of this information following the transaction to comply with our legal obligations, for example holding information about transactions for tax purposes. We process payments using WorldPay.
- **Provision of CPD.** Where part of our service to you includes the provision of CPD training, for example our RIBA approved CPD training, we will use your CPD Details in performance of our contract with you and to comply with our legal obligations for example health and safety law.
- **Requests, queries and complaints.** We use personal data to respond to requests, queries and complaints received from customers and prospective customers, the data we use to do this includes Business Details, Key

Business Contacts and Order Details where this relates to a specific order. We do this as it is necessary for us to take these steps prior to entering into a contract with you, in performance of a contract we already have with you or for our legitimate interests to provide our customers or prospective customers with a high level of customer service.

- **Technical.** As well as any personal data that you may give to us we may collect Technical Data to administer and protect our business and our website (including data analysis, testing, system maintenance, support, reporting and hosting of data). This is necessary for our legitimate interests for running our business, provision of administration and IT services, network security and to prevent fraud.
- **Visitor Monitoring.** We use Visitor Details when you visit our premises to ensure the security of our premises, business and employees.
- **Warranties.** We use Warranty Registration Details in order to fulfil any product warranties. This may be because we have sold the product to you and have contractual obligations to you, or because we have been appointed by the manufacturer of the product to provide warranty services on its behalf, where doing so is in our legitimate interest in performance of that contract. Depending on the product and the requirements of the manufacturer this may involve us holding Warranty Registration Details provided at or around the point at which you

purchased the product, asking for proof of purchase if you wish to make a warranty claim, or making use of the manufacturer's warranty database.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. Cookies

We may place information on your computer to allow us to identify you. This is not as sinister as it may sound and the information is often known as "cookies". Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of our website and to compile statistical reports on website activity, and in certain circumstances allow our website to perform more effectively for the visitor.

We will only use these cookies to look at information on your hard drive that was put there by a cookie from our website and any cookies will be stored on your computer and not on our website.

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

10. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the [Purposes for which we will use your personal data](#) section above.

Internal Third Parties

We may share your personal data with other companies in our group, details of which can be found here: <https://www.sfs.com/ch/en/sfs-group> ("Group") acting as joint controllers or processors and providing IT and system

administration services. We also may share your personal data with our Group companies in some urgent cases in order to meet delivery timescale requirements due to the geographical location of the delivery location.

External Third Parties

- Service providers acting as processors based in the UK, the European Union and Switzerland who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- Delivery providers based in the country in which the delivery location in relation to any particular order is based.
- Marketing service providers based in the UK acting as processors.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

Other Third Parties

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

11. International transfers

We share your personal data within the Group. This will involve transferring your data outside the European Economic Area (**EEA**).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For example we share Customer Details etc.

via our SAP system with the Group company in Switzerland. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

12. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

13. Social media and online engagement

We occasionally use a variety of new technologies and social media options to communicate and interact with you. These sites and applications include Customer experience feedback, popular social networking and media sites. To better engage the public in ongoing dialog, we use certain third party platforms including, but not limited to, Ask Nicely, LinkedIn and Twitter. These third party websites and applications are web-based technologies that are not exclusively operated or controlled by us. When interacting on those websites, you may reveal certain personal information to us or to third parties. Other than when used by our employees for the purposes set out in this privacy policy, we will not use, share, or retain your personal information.

The AskNicely privacy policy is available at: <https://www.asknicely.com/privacy>

The Twitter privacy policy is available at: <http://twitter.com/privacy>

The LinkedIn privacy policy is available at: <https://www.linkedin.com/legal/privacy-policy>

14. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax or reporting requirements. We have set out more detail below about how long we consider it necessary to retain data for certain purposes.

By law and in order to answer any order queries or respond to any claims regarding orders or products including potential legal claims, we retain a record of some of the basic information about our customers and the orders made including

Order Details, Invoices and Delivery Notes (excluding Labels which are sent to your delivery address). We retain this information for this purpose for a period of up to 10 years from the date of the relevant order.

This information is secured and access is further restricted to ensure these records are not used for any other purposes than to respond to such legal, accounting, tax and any other related order queries or claims if necessary.

We retain Warranty Registration Details for the lifetime of the relevant product warranty.

We may also retain Due Diligence Details indefinitely from when the due diligence checks were carried out. If you continue to be our customer and we still require due diligence information for our legitimate interests we will renew and replace the Due Diligence Details held with up to date information but may retain details of the previous checks for our records.

We retain Credit Facilities Application Data and ePortal Details indefinitely from the date when this was provided to us. This information is secured and access is restricted to ensure these records are not used for any other purposes than those set out above.

In respect of our marketing activities we retain Business Details, Key Business Contacts and Marketing Preferences for the lifetime of our business relationship with you or until you ask us to remove or update this, see [Your legal rights](#) below for further details. Should you change your Marketing Preferences or exercise any of [Your legal rights](#) we may retain limited information on a suppression list in order to ensure that we do not contact you again.

We retain Technical Data indefinitely from the date of creation however this is often anonymised and/or aggregated at an earlier date.

We retain Visitor Details indefinitely from the date of the relevant visit.

We retain CPD Details indefinitely following the date of the relevant CPD Training.

We may also retain Business Details following responding to a query to ensure that we have a record of the query and the response should you need to clarify anything with us or should we need to evidence to the manufacturer of the product that we are complying with our obligations as its distributor. For complaints, we retain such information for a period of 30 years from the date of the relevant contact. For Warranty related issues, we retain such information for a period of 40 years from registration of the warranty.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we will anonymise and/or aggregate your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

15. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. If you wish to exercise any of the rights set out above, please [Contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is

not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.