

SPECTRUM CHEMICALS PRIVACY NOTICE

1. Why have you been given this privacy notice?

Spectrum Chemicals Ltd is a "data controller". This means that we are required under data protection legislation to notify you of how we will process your personal data both during our contractual obligation and post sale. This notice will explain how we collect your personal data, its use, storage, transfer and security. We will also explain what rights you have in relation to how we process your personal data. It is important that you read this notice, together with any other privacy notice we may provide during our contract, so that you are aware of how and why we are processing your personal data. We may update this notice at any time.

2. What are our obligations to you in relation to how we process your personal data?

We are required by law to ensure that when processing any of your personal data that it is:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept in a form which permits you to be identified for only as long as necessary for the purposes we have told you about.
- Kept securely.

3. What personal data will we collect, use and store about you?

- Your name, salutation, addresses, contact numbers, and personal email addresses to enable us to carry out our contract with you from point of order to delivery.
- Information about your use of our information and communications systems.
- Payment card details at the point of payment only. These are not stored on our database and we only have access to minimal information on these using our secure card payment services. (Please see Worldpay website for a copy of their privacy notice)
- The type of vehicle you drive and its registration should you collect an order from our site, through the means of CCTV. This is retained with recordings being overridden automatically on a monthly basis

4. How do we collect your personal data?

The GDPR law allows legitimate use of your data in understanding our customer and providing them with the highest levels of customer service that they expect. If you choose not to share personal data with us or refuse contact permissions we may not be able to provide you with the service that you have asked for.

- When you contact us by any means with enquiries, orders, technical advice or any information about our products and services.
- When you complete a credit application form should you require an account.
- When you submit an enquiry through our website.

5. How will we use your personal data?

For the most part we will use your personal data for one of the following lawful bases:

- a) Where we need to perform the "contract" we have entered into with you.
- b) Where we need to comply with a legal obligation such as VAT purposes.
- c) To send you updates to products and technical properties as well as updates to Privacy notices, such as this

SPECTRUM CHEMICALS PRIVACY NOTICE

- d) Customer feedback for the purpose of ISO9001 standard
- e) Where it is necessary for our legitimate interests with third parties, such as our haulier or consultants, where your interests and fundamental rights do not override those interests, to enable you to receive the best service

There are other rare occasions where we may use your personal data, which are:

- f) Where we need to protect your interests (or someone else's interests)
- g) Where it is needed in the public interest or for official purposes

6. When will we use your personal data?

We will use your personal data to enable us to fulfil our contractual obligation to/with you

7. Your failure to provide information

We will only ask you to provide information which we believe is necessary for the performance of the contractual employment relationship (for example bank account details to pay you) or our associated legal obligations (for example giving salary information to HMRC). If you fail to provide certain information when requested we may not be able to meet our contractual obligations to you or we may not be able to fulfil our legal obligations.

8. What happens if we need to use your personal data for a new purpose?

We will only use your personal data for the stated purposes, unless we consider that there is a need to use it for another reason and that reason is compatible with the original purpose. However, if we consider that it is necessary and reasonable to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

There may be circumstances where we have to process your personal data without your knowledge or consent, where this is required by law and in compliance with the above rules.

9. How do we use your sensitive personal information data?

Any personal data which reveals your, ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic, biometric or health data, sex life and sexual orientations will be regarded as special categories of personal data. We will only use this data in the following ways:

- In order to comply with employment and other laws when processing and managing situations connected with absences arising in relation to your sickness or family/ dependant related leave.
- To ensure we meet our health and safety obligations towards you and other employment related obligations we will use information about your physical or mental health or disability status to assess your capability to perform your role, monitor and manage your sickness absence, provide appropriate workplace adjustments and administer health related benefits.
- Where it is needed in the public interest, for example for equal opportunity monitoring and reporting.

There may be circumstances where we need to process this type of information for legal claims or to protect your interests (or someone else's) and you are not able capable of giving your consent or where the relevant information has already been made public.

10. Do we need your consent to use sensitive personal data?

If we are using your personal sensitive data in accordance with our written policy to perform our legal

SPECTRUM CHEMICALS PRIVACY NOTICE

obligations or exercise specific rights connected to your employment, in these circumstances we do not need your written consent to use sensitive personal data.

However, in limited circumstances, we may request your written consent to allow us to process your sensitive personal data. For example, your written consent will be required before we instruct a medical practitioner to prepare a medical report. If, it becomes necessary to request your consent to process your sensitive personal data, we will provide you with details of the information that we require and why we need it, so that you can decide whether you wish to provide your consent. It is not a condition of your contract of employment with us that you must agree to any request for consent. Giving consent will always be a decision made by your freewill/choice.

11. Criminal convictions

We don't envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and duties you will perform and where we are legally entitled to do so.

We have in place policy and safeguards which we are required by law to maintain when processing this data.

12. Automated decision making

It is our intention that you will not be subject to automated decision making which will have a significant impact on you, unless we have a lawful reason for doing so and we have notified you.

13. Will we share your personal data with third parties?

In order to meet our contractual obligations connected with your purchasing/sales relationship with us it is necessary to share your personal information with certain third parties (see below). We also need to share your data when we have legitimate business reasons for doing so and also where it is necessary in order to perform your contract.

14. Which third party service providers will we share your personal data with?

The following third-party service providers process personal information about you for the following purposes: Haulage / Carrier.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

15. Third party service providers and data security

Third party service providers, such as our hauliers, are only permitted to process your personal data in accordance with our specified instructions. They are also required to take appropriate measures to protect your privacy and personal information. We do not allow your information to be used by the third parties for its own purposes and business activities.

16. Will we share your personal data with other entities within our business group?

Your personal details will not be shared within our Group.

17. Will we transfer your personal data outside of the European Economic Area (EEA)?

We do not transfer personal data outside the EEA.

SPECTRUM CHEMICALS PRIVACY NOTICE

18. How do we ensure your personal data is secure?

We take your privacy and protection of data very seriously. Consequently, we have put in place appropriate security measures to prevent unauthorised use of your personal data. Details of the measures which are in place can be obtained from Sarah Campbell. We will notify you and any applicable regulator of any suspected unauthorised use of your personal data.

19. How long will we keep your personal data?

We will retain your personal data for as long as is necessary to fulfil the purposes for which it was collected for. We will retain this information for 7 years after the last order placed in accordance with our ISO Quality process and accountancy purposes business. After this time we will securely destroy your personal data in accordance with other applicable laws and regulations.

20. Your duty to inform us of any changes

In order that we can ensure that the personal data we hold in relation to you is accurate, it is important that you keep us informed of any changes to that data.

21. What rights do you have in respect of how we use your personal data?

Subject to legal limitations you have the right to:

- **Request access to your data:** You can ask us to provide a copy of the personal data we hold about you.
- **Request corrections to be made to your data:** If you think that your personal data is incomplete, inaccurate you can ask us to correct it.
- **Request erasure of your data:** If you consider there is no lawful basis for us to continue processing your data you can ask for that data to be deleted or removed.
- **Object to the processing of your data:** If our lawful basis for processing your data relates to a legitimate business interest (or third party interest) you can raise an objection to that interest. You can also object to us using your information for direct marketing purposes.
- **Request that processing restrictions be put in place:** If you believe that your information is being processed without a lawful reason or that the information is incorrect you can request that a freeze/restricting is placed on the processing of the information until your concerns are addressed.
- **Request a transfer of your personal data:** You can ask us to transfer your personal data to a third party.

If you wish to exercise any of the above rights please contact Sarah Campbell

22. Will I have to pay a fee?

You will not be expected to pay a fee to obtain your personal data unless we consider that your request for access to data is unfounded or excessive. In these circumstances we may charge you a reasonable fee or refuse to comply with your request.

23. Confirmation of identity

SPECTRUM CHEMICALS PRIVACY NOTICE

Whenever you make a request for access to personal data, we may request specific information to confirm your identity. This is usually done to ensure that we are releasing personal data to the correct person.

24. Right to withdraw your consent

If we have asked for your written consent to obtain information, you have the right to withdraw your consent at any time. To withdraw your consent please contact Sarah Campbell via email on sarah@spectrumchemicals.co.uk. Once we receive your notice of withdrawal we will cease processing your data unless we have any other lawful basis on which to continue processing that data.

25. Important information about this privacy notice

We reserve the right to amend or update this privacy notice at any time. We will provide you with a new notice when we make any updates.

26. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative on 01933 664141. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

The logo for Spectrum Chemicals features the company name in a light blue, lowercase, sans-serif font. The text is centered and partially overlaid by a large, stylized graphic consisting of several overlapping diagonal stripes in shades of light blue and white, creating a sense of motion or a spectrum. To the right of the text, there is a faint, circular graphic element resembling a ripple or a lens flare.