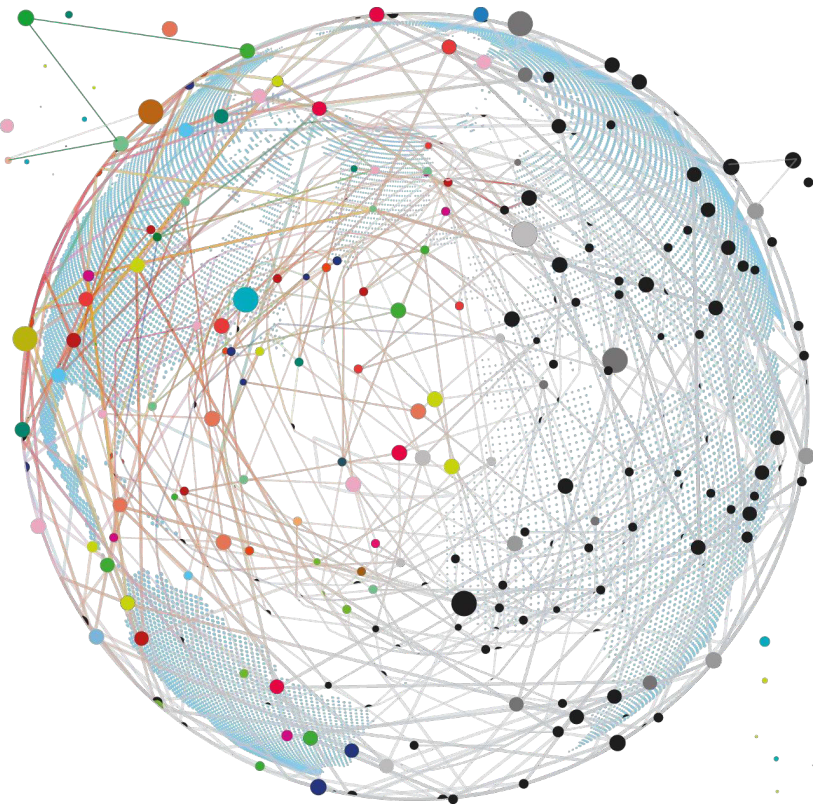


# Website Privacy Notice





## Website Privacy Notice

<https://colloids.com/privacy-policy>

### Aim and scope of the policy

The Privacy Policy explains how we may use personal data that you provide us with, or any that we may collect from or about you as a customer of, or supplier to, Colloids, and as a user of this website. This Privacy Policy contains the information required under the general data protection regulation as incorporated into the UK, the "UK GDPR".

**Commented [LD1]: Note to Colloids:** we can either display the exact same notice on each of the three businesses' websites or we can change this reference to PW Hall or PMB as appropriate re the other privacy notices and the references in the next paragraph.

We are Colloids Ltd. (Colloids), part of the Tosaf Group and our address is Kirkby Bank Road, Knowsley Industrial Park North, Merseyside L33 7SY. We are a controller of your personal data. Depending on the website you are visiting, or the entity which you are receiving services from, this Privacy Policy is also applicable where either of Colloids' affiliates are acting as controller, namely Performance Masterbatches Ltd. or P.W. Hall Ltd.

We have a dedicated **data privacy lead** who manages any data protection related communications. You can contact them at the following email address: [Nikki\\_thompson@colloids.com](mailto:Nikki_thompson@colloids.com) marking it for the attention of the Colloids Group **Data Privacy Lead**, or by using the [contact us](#) section of our website.

**Commented [LD2]: Note to Colloids:** to amend once the DPO/privacy role has been decided on and a title confirmed.

**Commented [NT3R2]:** Data Privacy Lead will be the job title

### What personal data do we collect?

Under the UK GDPR, 'personal data' is defined as any information relating to an identified or identifiable natural person.

In your use of our services and this website, we may collect names, business addresses, business telephone numbers, mobile phone numbers, email addresses, information relating to products and services you have bought from us, products and services we have bought from you, records relating to our contact with you regarding such products and services, your marketing preferences, and information about your business which we obtain from credit reference agencies.

In addition, where you use our website, certain personal data may be collected automatically from your browser or device. This could include device type, browser type, IP address, operating system, device identifier, and Internet service provider, as well as other information such as general location information, domain name, page views, a date/time stamp, referring and exiting URLs, language, clickstream data and similar device and usage data. Please also see our Cookie Policy for more information on the cookies we use.

**Commented [JS4]: Note to Colloids:** we have inserted this line to account for any information collected via cookies.

We do not collect any information which could be deemed as special categories of personal data as defined under the UK GDPR (being information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation).

### Where do we get that personal data?

We obtain personal data from you directly when you contact us with an enquiry, regarding our products and services, alternatively when we buy products and services from you. We may collect data through email, forms you complete (both paper and electronic), during telephone conversations, online, in meetings and through enquiries.

We may also collect information about you from other publicly or commercially available sources, such as our business partners, suppliers, vendors and other third party sources (e.g. public databases and professional social networks).



**What do we use your personal data for, and what are the applicable lawful bases for processing?**

The lawful basis for Colloids' processing of personal data will depend on the purposes of processing. Under the UK GDPR, Colloids are required to justify each purpose of processing with an applicable lawful basis.

<i>Purpose of processing</i>	<i>Lawful basis</i>
Processing business contact data where applicable to the delivery of our products and services including: <ul style="list-style-type: none"> <li>Assessing a request for our products and services, including price, payment methods and credit terms;</li> <li>Managing the provision of the goods, including confirmation of Colour Match requests, Order receipt, Order delivery and any other enquiries; and</li> <li>Managing the Ordering, receipt and provision of goods or services from you.</li> </ul>	Processing is <b>necessary for our performance of the contract</b> we have with you, or <b>to take steps to enter into a contract</b> with you
Processing where required by applicable laws in providing it to law enforcement agencies and other governmental bodies.	<b>Legal obligation.</b>
Retention of business records, where required to do so by applicable laws.	<b>Legal obligation.</b>
Undertaking fraud prevention / anti-money laundering checks.	<b>Legal obligation.</b>
Responding to queries, requests or complaints about our business.	We have a <b>legitimate interest</b> in providing a response customer service function.
Operating our website, including the use of essential cookies to assist with its functioning website.	We have a <b>legitimate interest</b> in providing a website which is functional for customers to use when interacting with our business online, and is as secure as it can be from external threats.
Conducting customer research.	We have a <b>legitimate interest</b> in understanding how our products and services are received and used so we can make improvements to them.
Analysing customer service interactions.	We have a <b>legitimate interest</b> in finding improvements to our customer service function, and then actioning those improvements.
Investigating, establishing and taking action in respect of potentially unlawful conduct or conduct in breach of contract or applicable law / regulation.	We have a <b>legitimate interest</b> in exercising, establishing and defending our legal rights.
Considering or taking steps to enter into a reorganization, restructuring, merger, acquisition or transfer of assets, or other business transaction.	We have a <b>legitimate interest</b> in being free to dispose of, or restructure, our business or assets.



### When do we share your personal data with other organisations?

We share your personal data with a number of other organisations. For example: our affiliates; credit reference agencies; insurance providers; hauliers; services providers that assist us with IT operations, finance processes and analytics; professional advisors, where applicable for legal, regulatory or accounting issues.

**Commented [JSS]: Note to Colloids:** we provided some further examples of recipients – are you able to review and confirm, and add any as necessary?

We only share personal data in order to fulfil the purposes set out above and if this requires contractual measures to be put in place with that third party, we ensure the relevant contracts are entered into.

### Is your personal data transferred outside the UK or EEA?

We primarily process your data in the UK and the European Economic Area (EEA), but sometimes your personal data may be transferred outside the UK and EEA. Where we do this, seek to ensure that either (i) we are transferring personal data to an adequate jurisdiction such as Israel and (ii) contracts with the importing entities incorporate the UK international data transfer agreement, or will rely on other legally permitted appropriate safeguards, unless certain exceptions apply. For example, we may need to transfer some personal data to our affiliates in USA and China.

If you would like to understand which safeguards apply to your data and obtain a copy of these for your reference, you can contact us via the details in this Privacy Policy.

**Commented [LD6]: Note to Colloids:** if Colloids enters into an intra group agreement then we could reference that here.

### How do we share your information with credit reference agencies?

We apply for credit insurance.

**Commented [JS7]: Note to Colloids:** could you elaborate on the purpose of applying for credit insurance?

### What should you do if your personal data changes?

You should tell us so that we can update our records. Please use the contact details in this Privacy Policy, visit the contact us section of our website or use the tool provided on the footer of the website regarding [data rectification](#).

**Commented [LD8R7]:** For example, is this regarding customers? It seems likely that the credit in that case would be in respect of a company rather than an individual.

### Do you have to provide personal data to us?

Where we process your personal data to perform a contract with you or to comply with a legal obligation, the provision of your personal data is compulsory so far as it is either a contractual or statutory requirement, or a requirement necessary to enter into a contract. In such cases, provision of your personal data is mandatory since it would not otherwise be possible to enter and perform our contract with you, or to comply with our legal obligations.

### Do we do any monitoring involving the processing of your personal data?

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interest of protecting the security of our communications systems and procedures, and for quality control and staff training purposes. This information may only be shared for the purposes described above.

**Commented [LD9]: Note to Colloids:** what monitoring takes place re customers/suppliers/website users? Can we elaborate more on this point or remove?

### What about other automated decision making?

We don't process any data which is subject to automated decision making.

### How long will we retain your personal data?

Unless we explain otherwise to you, we'll hold your personal data based on the following criteria:



- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as someone could bring a claim against us
- Retention periods in line with legal and regulatory requirements or guidance

#### **How do we keep your personal data secure?**

We will maintain reasonable physical, electronic, and procedural safeguards to protect personal data from loss, misuse and unauthorised access, disclosure, modification, and destruction which are described in Colloids' detailed security schedules. Some of the methods we use include the following:

- Storing your personal data, in all forms, in a secure environment
- Access to confidential personal data is limited to employees, contractors and software vendors who have a need to know such data in carrying out their tasks
- Security controls which protect our entire IT infrastructure from external attack and unauthorised access
- Regular penetration testing of systems
- Breach detection service to ensure we respond quickly to any suspected data security breach

#### **What are your rights under data protection laws?**

Individuals have a number of rights under the UK GDPR as set out in the list, below, however note that some of these are subject to exemptions. We generally have one month to respond to such a request. If you want to access any of the rights set out below, we may ask you for additional information to confirm your identity. We also reserve the right in some occasions to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

- The right to be informed about your processing of your personal data (which we undertake via this Privacy Policy)
- The right to have your personal data corrected if it's inaccurate and to have incomplete personal data completed
- The right to object to processing of your personal data
- The right to restrict processing of your personal data
- The right to have your personal data erased (the 'right to be forgotten')
- The right to request access to your personal data and to obtain information about how it is processed
- The right to move, copy or transfer your personal data
- The right to withdraw consent to processing of your personal data where this is undertaken on the basis of consent.
- The right to lodge a complaint with the Information Commissioner's Office in relation to our processing of your personal data (<https://ico.org.uk/make-a-complaint/>)
- You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us using the contact details above to exercise these rights.

Note that we operate a tool on the website which you can use to automatically request [access](#) to your data, request [erasure](#) of your data, or request a [correction](#) to your data.

#### **What are your marketing preferences and what do they mean?**



We may use your phone numbers, business address, email address, social media or digital channels to contact you. Where applicable we could contact you according to your marketing preferences. You can stop receiving our marketing communications at any time by contacting us using the details above or using the tool on our website to [unsubscribe](#) from marketing.

**Changes to this Privacy Policy**

We may change this Privacy Policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. Where there are material changes to the way in which we process your personal data, we will notify you of these changes.

**Contact us**

If you have any questions about this Privacy Policy, or you wish to exercise your rights, you can email us using the details set out above or go to the [contact us](#) section on our website.