

Privacy Notice For Our Service Providers/Suppliers

What Is The Purpose Of This Notice?

This notice applies to all businesses operating within The Alumasc Group plc group of Companies (the “Group”), as follows:

| Business | Company / Data Controller |
|---|--|
| Group Head Office | The Alumasc Group plc |
| Alumasc Roofing & Walling (including Roof- Pro) | Alumasc Exterior Building Products Limited |
| Alumasc Water Management Solutions | Alumasc Exterior Building Products Limited |
| Rainclear | Alumasc Exterior Building Products Limited |
| Timloc Building Products | Alumasc Limited |
| Gatic | Alumasc Limited |
| Levolux | Levolux Limited |
| Wade | Wade International Limited |

In this notice we refer to the Alumasc business that you deal with as “**Company**”, “**We**”, “**Us**” and “**Our**”). We are committed to protecting and respecting Your privacy.

This notice is provided for our prospective, existing and former suppliers (referred to in this notice as “**You**” and “**Your**”). This notice tells You about how We process Your personal information, including Our collection, usage and sharing of Your personal information. The information in this notice may not apply to all of the above Alumasc businesses. Some Alumasc businesses may not use your personal information to the full extent described in this Privacy Notice. However, unless You tell Us otherwise each business will share Your personal information with other Alumasc businesses.

We will only process Your personal information in accordance with the Notices (and any other information We give to You about how We process Your personal information) and in accordance with the Data Protection Legislation.

In this notice, the terms “**Data Controller**”, “**Controller**”, “**Data Processor**”, “**Processor**” and “**personal information**” each have a meaning set by law (“**Data Protection Legislation**”). The Data Protection Legislation is, from the date it comes into force in the United Kingdom, the EU General Data Protection Regulation (2016/679) and, until such date, the Data Protection Act 1998. Please note that “personal information” is, whilst the Data Protection Act 1998 is in force, a reference to “personal data” as defined under that Act.

Your Data Controller

We are a Data Controller in relation to Your personal information. Our address is c/o The Alumasc Group plc, Station Road, Burton Latimer, Kettering, Northamptonshire, NN15 5JP. We can be contacted by email as set out in the following table.:

| Business | Email |
|---|----------------------------|
| Group Head Office | DP@alumasc.co.uk |
| Alumasc Roofing & Walling (including Roof- Pro) | DP@alumasc-exteriors.co.uk |
| Alumasc Water Management Solutions | DP@Alumascwms.co.uk |
| Rainclear | DP@rainclear.co.uk |
| Timloc Building Products | DP@timloc.co.uk |
| Gatic | DP@Alumascwms.co.uk |
| Levolux | DP@levolux.com |
| Wade | DP@Alumascwms.co.uk |

Your Personal Information

What personal information do We collect about You?

We obtain Your personal information (including that of Your staff) from the following sources:

- **From Your staff:** Your staff will know what personal information We obtain from them, because the member of staff (or someone they have authorised Us to deal with e.g. another member of your staff) has provided it to Us. Examples of how We obtain personal information about You includes when You market, offer and/or agree to supply Us with products and services (including as part of any bid or tender process); when You give Us information via email, during a telephone call or in face to face discussions and also from networking events, trade shows and exhibitions. We will also hold health and safety training records related data about You and Your performance of Your contracts with Us.
- **From third parties:** We may obtain personal information about You from third party sources, by way of introduction. For example, We may be passed Your details by other parties within the industry/our clients as a potential supplier.
- **From the Group:** We may obtain personal information about You from members of our Group.
- **From Your employees:** We may obtain personal information about You from Your employees and other staff who have been introduced to Us.
- **From Your customers and contacts:** We may obtain personal information about You from Your customers and clients who have been introduced to Us. .

What choices do you have as to the personal information We collect?

To complete an order with You to buy goods and services from you, as a minimum We need the following in order to place the contract:

- Your name, postal address, email address and phone numbers, as well as a contact within Your business and details of Your preferred method of contact ("**Contact Details**").
- The description and quantities of the goods and services You will provide to Us.
- Your payment details.
- Satisfactory pre-qualification checks including:
 - the names of team members and their training certificates;
 - immigration Visas;
 - health and safety details.

If You prefer for Us to hold and/or to use less personal information about You, You can choose to make less available but please note that withdrawing or withholding personal information from Us will mean that You may not receive updates and requests for further goods and services from Us (whether by telephone, email or other means), plus it may mean that We cannot place a contract with You for the purchase of goods and/or services if You do not provide Us with the minimum details (as set out above).

If You ask us to erase any of Your personal information We may be unable to comply with Your previous instructions to Us about Your personal information. For example, if We erase records of Your instruction not to email You, You may receive an email from Us if We subsequently lawfully acquire Your email address from a third party.

Using Your Personal Information

How do We use Your personal information?

For as long as We have access to Your personal information, We will use it for the following purposes, unless otherwise required as a result of Your exercising Your data protection rights. We may use Your personal information for any of the following purposes, whether We obtained it directly from You (or someone You authorise), or another source.

| Use | Basis of Use |
|---|--|
| To contact You about a potential supply arrangement with You | Our legitimate interest in approaching You about possible business opportunities. |
| To make a decision to buy goods and/or services from You, including making enquiries of You, undertaking supplier approval checks and negotiating the terms of any contract | Our legitimate interest in approaching You about possible business opportunities and taking steps to enter into a contract. |
| To perform Our obligations to You under the contract with You for the supply of goods and services, including the processing of payments to You | Our legitimate interest in complying with our obligations under a contract with You. |
| To take legal or administrative action in relation to Our supply arrangement with You, including to enforce the terms of the contract and resolve any disputes | Our legitimate interest in enforcing the contract and in resolving disputes with You and as necessary to establish, exercise or defend legal claims. |
| To undertake financial management, planning and reporting within Our business | Processing will be in Our legitimate interest in respect of corporate governance and management. |
| To undertake health and safety management activities and checks | Processing will be in Our legitimate interests to ensure the health and safety of our staff and visitors to our premises. |
| To keep in touch with You regarding future business opportunities | Our legitimate interest in staying in touch with You to propose and discuss potential repeat business. |
| We may cite You as a referee in tenders, and may include case studies about Our work with You, unless You tell us otherwise. | Our legitimate interest in ensuring We are able to present effective tenders that contain examples of Our work and referees for the Commissioner to contact provided that You can ask Us to stop at any time (in which case We will stop). |

Keeping Your Personal Information

How long will We retain Your personal information?

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. We will retain Contact Details and records of Our contact with You until You ask Us to delete them. We will retain details relating to the orders We place with You or Your organisation for as long as necessary for Us to establish, exercise or defend legal rights. There can be extensive guarantees from Our suppliers (for example 15 or even 30 years) and in such circumstances We will need to hold personal information consisting at least of name(s), contact details and relevant records (such as correspondence) for extended periods in line with the guarantee given by suppliers.

In determining the appropriate period for the retention of Your personal information, We consider the amount, nature and sensitivity of that data, the purposes for which We process your personal information and whether We can achieve these purposes by other means, as well as the applicable legal requirements.

Sharing Your Personal Information

Who do we share you personal information with?

For as long as We have access to Your personal information, We may share any of it with any of the following to the extent that they need to have access to Your personal information in order to perform their role:

- Any employee within Our organisation and our group of companies.
- Selected third parties who help Us to perform Our contract with You. This includes third parties who help Us directly (such as other of Our suppliers) and third parties who help Us indirectly (such as external marketing companies and service providers who host and/or transmit data about You for Us, such as We-transfer). We do not share Your personal information with third parties for their own marketing purposes.
- Our banks and other payment processing service providers who process Our payments to You.
- Some of Our IT is operated and provided for Us by other members of Our Group. We and other Group companies use third party IT service providers who maintain, improve, manage, optimise or fix the IT systems that We use or rely on in Our business, including computer devices, computer networks, connectivity, telecommunications and software, including our ERP system.
- Our professional service providers, such as accountants, auditors, legal advisers and insurance brokers
- Any third party company or companies in the event that We go through a business transition, such as a merger, being acquired by another person or company, or selling a portion of Our assets

We reserve the right to disclose Your personal information to other third parties if We have lawful grounds to do so, or are under a legal obligation to disclose or share it with them, or in order to establish, exercise or defend Our legal rights or to protect the rights or safety of the Company or Our staff.

Do we transfer Your personal information abroad?

In some cases We will hold in, or transfer Your personal information, to a location that is outside the United Kingdom, and even outside the European Union. This will be the case if you are, or a member of Our Supply chain for a particular opportunity or contract, is located outside the European Union.

We use IT facilities which are based outside of the EU, particularly Microsoft Azure. Microsoft Azure is a member of the EU-US Privacy Shield which provides safeguards for personal information.

We also have businesses outside of the UK who store personal information locally.

Your Rights

What if your personal information changes?

It is important that the information We hold about You is correct and accurate. Please tell us if Your personal information changes during Your relationship with Us.

What rights do you have?

In certain circumstances and by law, You have the right to:

- **Request access:** to Your personal information that We hold about You. This is commonly referred to as a “data subject access request”. This enables You to receive a copy of the personal information We hold about You and to check We are lawfully processing it.
- **Request Correction:** of Your personal information that We hold about You. This enables You to have any incomplete or inaccurate information We hold about You corrected.
- **Request Erasure:** of Your personal information. This enables You to ask Us to delete or remove personal information where: (i) there is no good reason for Us continuing to process it; (ii) You have withdrawn Your consent to Our processing; (iii) You have exercised Your right to object to processing (see below) and no exception permits Us to keep using it; (iv) it is established that We did not have the lawful right to process Your personal information; or (v) the law requires Us to erase Your personal information.

- **Object to processing:** of Your personal information where We are relying on a legitimate interest (or those of a third party) and where there is something about your particular situation which makes You want to object to the processing on this ground and there is no exception which applies to permit Us to keep using it or We use it for scientific or historic research purposes or statistical purposes.
- **Request the restriction of processing: of your personal information:** This enables You to ask Us to suspend the processing of personal information about You, for example if You want Us to establish its accuracy or the reason for Our processing it or You consider We no longer need to use Your personal information for the purposes for which it was collected or used (but You need it to be preserved for the purposes of legal claims). You may also ask Us to restrict processing if You have exercised Your right to object to Our use of Your personal information and no exception applies to permit Us to keep using it.
- **Request the transfer:** of Your personal information to a third party.

If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact Us using the contact details set out at the beginning of this notice.

No Fee is usually required

You will not pay a fee to access Your personal information (or to exercise any of the other rights). However, We may charge a reasonable fee if Your request for access is clearly unfounded or excessive. Alternatively, We may refuse to comply with Your request in such cases.

What we may need from you

We may need specific information from You to help us to confirm Your identity and ensure Your right to access the information (or to exercise any other right). This is another appropriate security measure to ensure that the personal information is not disclosed to someone who is not entitled to receive it.

Withdrawing consent

In the limited circumstances where You have provided Your consent to the collection, processing and transfer of Your personal information for a specific purpose, You have the right to withdraw Your consent for that specific processing at any time. To withdraw Your consent, please contact Us using the contact details set out at the beginning of this notice. Once We have received notification of Your withdrawal of consent, We will no longer process Your information for that purpose, unless we have another legitimate basis to do so by law.

Data Protection Manager

We are not required to appoint a Data Protection Officer to comply with the law but we have appointed a Data Protection Committee to oversee compliance with this notice. If you have any questions about this notice or how we handle your personal information, please contact Us using the contact details set out at the beginning of this notice. 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 matters.

Changes to this Notice

We reserve the right to make changes to this notice from time to time. If this notice changes in any way, We will place an updated version on Our Website. Regularly reviewing Our Website will ensure that You are always aware of what information We collect, how We use it and under what circumstances, if any, We will share it with other parties. If We make material changes to this notice, We will notify You via a prominent notice on Our Website and email footers.

If you do not agree to the changes that We make from time to time, please tell Us via the contact details set out at the beginning of this notice.