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Website Privacy Policy

Last updated: May 2018

Supponor Holding Limited and its subsidiaries (known collectively as “Supponor”) is committed to ensuring that when we collect and use information about people who visit our website or contact us in other ways (as described below), we do so in accordance with applicable data privacy laws. This Privacy Policy explains how we may use information that we obtain about you and how you can exercise your rights with respect to your personal information. Changes to the content or services found on our website may be changed without notice, and consequently our Privacy Policy may change at any time in the future. You should visit this page regularly to check for changes.

Under EU data protection laws, personal information may only be used where one of the following applies:

- you have consented to the use
- we use it to achieve a legitimate interest, and our reasons for using it outweigh any prejudice to your data protection rights
- it is necessary to enter into or perform a contract with you
- we need to use it to comply with our legal obligations
- the use is necessary for us to protect your vital interests (or another person's)
- we need to use it to perform a task in the public interest

Generally, we will process data on one of the first two grounds listed above. If we are processing on the basis of consent, you will be presented with an opportunity to consent at the point where we collect your data. You may withdraw your consent at any time through the data preference centre (see further details below). If we are processing on the basis of our need to achieve a legitimate interest, the nature of that interest is set out below.

Supponor uses Silver Agency Ltd. as its website hosting provider.

What information do we collect

If you visit our website

When someone visits www.supponor.com, we use a third-party service, Google Analytics, to collect standard internet log information (your IP address, browser, and type of device) and details of visitor behaviour patterns (where you joined our site from, the path you take through our site and where you leave the site). We do this for the legitimate business purpose of monitoring the number of visitors to the various parts of the site and engagement levels, which in turn enables us to make improvements. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.



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Suppor also uses cookies on its website. The list of cookies used on the website is shown in the table below. For more information about cookies and how to manage them, please visit <https://www.aboutcookies.org>.

Host Name	Cookie Name	Retention Period	Purpose
.suppor.com	_ga	2 years	Used to distinguish users
	._gat_< property-id>	1 minute	Used to throttle request rate.
	_gid	24 hours	Used to distinguish users
	PHPSESSID	User session only	Storing a random session ID of user.
	ouibounceBannerBottomShown	Indefinitely	To track user from website to Crowdcube for analysing conversion rates.
.vimeo.com	vuid	2 years	Vimeo Analytics unique id
.google.com	1P_JAR	1 month	These cookies are used to gather website statistics, and track conversion rates.
	CONSENT	20 years	If you are logged into your Google account while visiting our site, Google is able to track your use of certain websites (such as ours) which use Google plugins. You will have agreed to this arrangement as part of signing up for a Google account, and Google will already have placed cookies on your device for this purpose.
	NID	6 months	
www.google.co.uk	DV	10 minutes	

If you call our contact numbers

When you call Suppor's contact numbers, we collect Calling Line Identification (CLI) information (which means we store the number you are calling from). We use this information for legitimate business purposes, i.e. to help improve the efficiency and effectiveness of our services.

If you email us

Any email sent to us, including any attachments, may be monitored by us for cybersecurity reasons. Email blocking software may also be used. Suppor has a legitimate business interest in using your email address and any personal data included in your message to resolve and respond to any issues raised. Your email will be handled in line with our policies, depending on the nature of your enquiry.

Emails sent to named individuals within Suppor (e.g. joe.bloggs@suppor.com) will be stored on our systems indefinitely for the legitimate business purpose of resolving your enquiry and then checking how enquiries have been dealt with, but will not be



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processed for any other purposes. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

If you use our enquiry form

When you submit information via our enquiry form, we collect your name, email address and telephone number if provided. We need to collect this data for the legitimate business purpose of processing your enquiry (we collect both email and telephone contact details in case we cannot reach you using one of these).

If you apply for a role at Supponor

If you apply for a role listed by a Recruitment Agency or in a trade press publication, you will provide your name, email address, postal address and telephone number. You will also be asked to submit a CV which is likely to contain personal information. All information you provide to us will be processed by ourselves and our sub-processors as appointed (Recruitment Agent) for the legitimate business purposes of processing your application and fulfilling roles advertised. Supponor will hold this data for a period of **one year** if your application was unsuccessful and use it to contact you in its legitimate interest if any other suitable roles come up, however for successful applicants this data will form part of your HR records which will be held for a period of seven years after your employment with Supponor ends (for legitimate business purposes connected with your employment).

If you make a complaint to us

When we receive a complaint from a person, we shall only use the personal information we collect for legitimate business purposes, i.e. processing the complaint and checking on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for **three years** from closure. Your information will be retained in a secure environment and access will be restricted according to the 'need to know' principle.



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How can you manage your personal information

Under data privacy laws, you have the rights to:

- Request access to your data

You can ask to see any personal information that we hold (known as a “subject access request”) in writing, addressing it to our Chief Financial Officer at the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

- Transfer your data

You can ask us to transfer your data to a third party. Again, this request may be made in writing to our Chief Financial Officer.

- Delete your data

You can ask us to delete the information we hold about you by writing to our Chief Financial Officer.

- Change your data

If we do hold information about you, you can also ask us to correct any mistakes by writing to our Chief Financial Officer.

Any data collected for a Data Subject Request is stored indefinitely so that we are able to demonstrate our compliance with data privacy laws.

Do we share your personal information

Other than as outlined above (for example where we use third party service providers), we will not usually disclose personal data. However, we may disclose your information to third parties in the following circumstances:

- if we are under a legal or regulatory obligation to do so;
- if we believe your use of our websites has or may violate any law, regulation or our Terms of Use,
- if we believe you are or may be a threat to safety, security, property, our rights or the rights of others; or
- in a merger, acquisition, change of control, joint venture or other business combination involving Supponor.



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How you can make a complaint about our use of data

Supponor tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

Any complaints should be addressed to the Chief Financial Officer using the contact details below. If we fail to resolve your complaint to your satisfaction, you have the right to contact the UK Information Commissioner. For further information on how to do that, please go to the following webpage: <https://ico.org.uk/concerns>.

How can you contact us

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Supponor's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

The person responsible for data protection and privacy at Supponor is Andrew Crean. If you want to request information about our privacy policy, make requests concerning your data or make a complaint, you can email privacy@supponor.com or write to:

FAO Chief Financial Officer
Supponor Holding Limited
12 Hammersmith Grove, Suite 3-125
London W6 7AP
United Kingdom