



CEMBRE

Privacy Policy – Customers and suppliers

Your privacy is important to us. This Privacy Policy explains what personal data we collect from you and how we use it.

Important Information

Cembre Ltd is a company registered in England under company number 2072165 . Our registered office is Dunton Park Kingsbury Road, Curdworth, Sutton Coldfield, West Midlands, B76 9EB , UK. We are the data controller for your personal data, and are registered with the Information Commissioner's Office under the reference ZA101475. Our Data Protection Contact can be contacted at kerry.evans@cembre.co.uk.

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What information we collect

Cembre Ltd collects data to operate effectively and provide you the best experiences with our products. You provide some of this data directly when interacting with us, such as when you submit your details to create a customer account or contact us with a query. We get some of it by recording how you interact with our products , for example, using technologies like cookies.

You have control over what data we collect. When asked to provide personal data, you may decline. However, if you choose not to provide data that is necessary to provide a good or service, we may not be able to provide that good or service.

The type and amount of data we collect varies in function of your relationship with us.

Name and contact data. We collect your first and last name, email address, postal address, phone number and other similar contact data such as delivery address.

Demographic data. We collect data about you such as your , gender.

Purchases. We collect data about the quotes you request, the orders you place and purchases you make. If you have an account with us, we also hold information about your balance and any overdue payment.

Credit accounts. If you apply for a credit account, we will collect your information to make searches with credit reference agencies and administer your account. You can find out more about this in the Credit checks section of How we share your data.

Your interactions with us. We collect the content of messages, e-mails, letters or phone calls you send us, such as feedback and product reviews you write, or questions and information you provide for customer support. When you contact us, phone conversations may be monitored and recorded.

CCTV. If you enter our premises , your image may be captured by our security cameras. Some of our CCTV facilities are monitored by a third party provider. We will regularly delete CCTV footage, unless it is being used



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to investigate an alleged crime or an incident, in which case it may be retained for up to **2 years** following the conclusion of any investigation.

Why we process your information

There are several grounds on which we may collect and use your data, depending on your relationship with us.

Because you have agreed. Where possible, we collect information about you with your consent. This is the case, for instance, when you fill in paper or online forms and choose to provide us with your information.

Because we need it to execute or take steps to enter into a contract with you. If you are one of our customers, we collect or use your personal data because it is necessary for the performance of a contract you are a party to, for instance to deliver goods you have ordered. We may also collect your information because you requested us to take steps prior to entering into a contract with us, for instance when you ask us to give you a quote.

Because it is in our legitimate interest. We also sometimes process your information in pursuit of our legitimate interests to:

- manage customer accounts and customer relationship;
- carry out direct marketing activities and send you communications in that regard;
- improve our business and operate it efficiently;
- prevent fraud; and
- ensure general safety and security.

When we process your information on that basis, we always make sure that we balance our interest in having the information with your rights and reasonable expectations.

Because we need it to comply with the law. In some very rare cases, we will need to retain your information because we are compelled to do so by law.

What we do with it

Cembre Ltd uses the data we collect to operate our business and provide the goods and services we offer. We also use it to send communications, including promotional communications and to serve our legitimate business purposes.

Providing and improving our goods and services. We use data to provide the goods and services we offer, improve them, and perform essential business operations.

Providing our goods and services. We use your data to process your transactions with us, e.g. the purchase of goods, and to provide our goods and services to you.

Customer support. We use your data to process any request for assistance you make and to provide other customer care and support services.

Legitimate business purposes. We use data to detect and prevent fraud, to resolve disputes and enforce our agreements. We also use it for our own legitimate business purposes including audit or internal training.

Business Operations. We use data to develop business intelligence that enable us to operate efficiently, make informed decisions and report on the performance of our business.

Communications. We use data we collect to deliver and personalise our communications with you. For example, we may contact you by email or other means to update you on a request you have made, invite you to participate in a survey or tell you that you need to take action to keep your account active..



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Promotional Offers. We also use your data to send you marketing communications about products, activities, promotions or other matters that we feel may be of interest or use to you. You can sign up for email subscriptions and choose whether you wish to receive promotional communications from Cembre by email, post and telephone.

How we share your data

We share your personal data with your consent or as necessary to complete any transaction or provide any good or service you have purchased. We may also share your details with suppliers or vendors we hire to carry out certain tasks on our behalf, and to exercise or defend our legal rights and fulfil our legal obligations.

Payment. When you provide payment data to make a purchase, we will share payment data with banks and other entities that process payment transactions or provide other financial services, and for fraud prevention and

Debt recovery. . If you apply for a credit account, Cembre Ltd will request a credit report from our credit rating agency. As part of this process, the credit rating agency will search your business records. You can obtain more information on how this agencies process your data by referring to their Privacy Policy, which will be displayed on their website.

When you apply for a credit account and place a subsequent order, Cembre will use the information on your business credit file to assist in making decisions. We may share those details with other companies in our group, or with fraud and theft prevention agencies.

Cembre Group. We share personal data among Cembre subsidiaries. We may also disclose personal data as part of a corporate transaction such as a merger or acquisition.

Finally, we will access, transfer, disclose and preserve personal data when we have a good faith belief that doing so is:

1. allowed under applicable law;
2. necessary to respond to valid requests for information, including from law enforcement agencies;
3. necessary to protect our customers, for example to prevent fraud.

Your rights / access

You have rights over how we use your data.

Access. You have a right to know whether we hold personal information about you. Where this is the case, you may request a copy of your personal data we held, as well as information about how it is being used. Your request will be responded to within one calendar month of your request. Please note that we may require you to provide proof of identity and, in certain cases, a fee, before we are able to provide any information.

Rectification. Where information held about you is inaccurate or incomplete, you may request its rectification or completion.

Objection. You have a right to object to the use of your data for marketing purposes. Additionally, where we have used your data in pursuit of our legitimate interests, you can ask us to stop (subject to conditions).

Restriction. You have a right to ask us to restrict our use of your personal data in some circumstances, for example whilst we investigate a complaint that the data we hold about you is inaccurate (subject to conditions).

Erasure. In certain circumstances, you may request that your information be erased (subject to conditions).

Withdrawal of consent. You are allowed to withdraw your consent to our use of your data at any time. If there is no other justification for the use of your data, we will stop using it.



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Complaint. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Contact, who will investigate the matter. If you are dissatisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office (www.ico.org.uk).

To exercise any of these rights, or for further information on how your personal data is handled, please contact our Data Protection Contact at kerry.evans@cembre.co.uk

Your Communications Preferences

You can choose whether you wish to receive promotional communications from Cembre by email, , postal mail and telephone. If you receive promotional email from us and would like to opt out, you can do so by completing the Disclaimer

You can also manage your preferences regarding the receipt of promotional materials by signing into the My Account section of our Website and update contact information, manage contact preferences, or opt out of promotional materials. Please note we will process your request promptly, but in some cases you may need to allow up to 14 days for the changes to be effective.

How long we keep your information

Cembre retains personal data for as long as necessary to provide you with the goods and services you have requested, to operate our business, or for other essential purposes such as complying with our legal obligations, resolving disputes and enforcing our agreements. How long we keep data for depends on what it is used for, so retention periods will vary for different types of data.

Find out how we determine how long we keep information for.

The criteria below are good indicators of how we decide how long to keep data for:

- How long is the personal data needed to provide the goods and services and operate our business? This includes such things as maintaining good business and financial records. This is the general rule that establishes the baseline for most data retention periods.
- Is Cembre subject to a legal, contractual or similar obligation to retain the data? This includes cases where the law prescribes we should keep information for a given period of time, or where data must be preserved during an investigation, for current or potential litigation or contractual purposes. Some data must also be kept for audit purposes.
- Have you provided consent for a longer retention period? If so, we will retain data in accordance with your consent.

Transfers abroad

In some cases, we may need to transfer your information outside of the European Economic Area because we (or a third party or vendor we use) store it on systems that are hosted abroad, or because we need to share it with companies that are not situated in the European Economic Area

Where this is the case, we will always ensure that your information is safe and only sent to organisations providing adequate safeguards, such as:

- Organisations established in countries providing adequate provisions to safeguard your personal information;
- Organisations who are contractually bound to protect your information;
- Organisations who have obtained Privacy Shield certification.

We may also transfer your data abroad if we have a legal obligation to do so.

Changes to this Policy



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This Policy was last updated July 2022. If we change our Privacy Policy, we will update the changes on this website. We may also place notices on other pages of the website so you check our current policy at any time.