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# PRIVACY POLICY

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**(Updated August 2023)**

## Introduction

This policy covers the processing of personal data by Almetron Ltd, whose registered address is at 24 Abenbury Way, Wrexham, LL13 9UZ (“Almetron Ltd”, “we” or “us”). Almetron Ltd is committed to protecting the privacy of your personal information.

Under the General Data Protection Regulation (GDPR) and related laws, Almetron Ltd have a legal duty to protect the personal information we collect from you. GDPR says that ‘personal data’ is any information relating to a living individual who can be identified, either directly or indirectly, from that information. This could include your name, email address, postal address or telephone number, or information collected online and used to identify you.

We are responsible for, and control, the processing of your personal data for the purposes of Almetron Ltd services. Almetron Ltd is therefore the Data Controller for all our services based in the UK.

Almetron has a data protection officer (DPO) who is responsible for answering questions in relation to this privacy notice. If you have any comments, concerns or questions, including any requests to exercise your legal rights, you can contact our DPO.

## Contact details

Data Protection Officer can be contacted:

By email: [info@almetron.co.uk](mailto:info@almetron.co.uk)

By telephone: +44 (0)1978 660297

By post: Data Protection Enquiries, Almetron Ltd Limited, 24 Abenbury Way, Wrexham, LL13 9UZ

## What data do we collect and how do we use it?

### Information you provide to us.

When you participate in, access, purchase or sign up to any of our services, activities or online content, such as posts, newsletters, surveys or events, we receive personal information about you which we use to provide these services. This may consist of data such as your name, email address, postal address and telephone number.

### Ordering a product or service from us.

If you order a product or service from us, you will need to provide certain personal details, including payment information, so the order can be fulfilled. In some cases, we will share some information with a third party to assist in the fulfilment of your order. An example would be shipping goods via a third-party carrier.

### **Content you share with us.**

When you choose to share comments, photos, videos and other content with, via email or other online methods means we may receive personal information about you.

### **Information collected online.**

We may collect information about how you use our website or other content online, and the device you use to access the services.

### **eCommerce**

**Email communications** We may keep track of the emails that we send you. We also keep a record of what communications you have selected to receive or not to receive. If you would like to opt out of receiving such emails you can unsubscribe at any time by contacting our DPO.

**Information from other sources** We may receive information about you from other sources (for example, missing information about your postal or email addresses) and add it to the personal information we hold about you. We may also receive data from other sources, such as our business partners, and social media platforms.

### **What lawful bases do we rely on for processing?**

In order to process your personal data, we must have a lawful reason for doing so. GDPR sets out six lawful bases under which organisations can collect, use and store personal data. We rely on four of the lawful bases:

#### **Necessary for the performance of a contract**

If you are our customer, we will process your personal data on the basis that it is necessary for us to provide our products and services to you.

#### **Consent**

In some instances, we rely on your specific consent to process your personal information. This is where you have actively agreed and 'opted-in', for example to receive marketing communications from us, and you have the right to withdraw your consent at any time.

#### **Compliance with laws**

We may have to process and share your personal data in order to comply with our legal obligations, or to protect our rights or the rights of others.

## Legitimate interests

In some situations, we rely on our legitimate business interests in order to collect and use your personal data. In these situations, we have conducted a balancing test to carefully consider the impact of the processing on your interests, rights and freedoms. We will only undertake the processing if we are satisfied there is no negative impact on you. We rely on Legitimate Interests for the following activities:

1. providing, maintaining, improving and developing our products and services;
2. sending direct marketing communications about our products and services to customers;
3. sending marketing communications related to the products and services of carefully selected companies in a business-to-business context;
4. managing suppression and unsubscribe requests;
5. researching publicly available business contact details;
6. managing certain aspects of our events;
7. analysing the use of our products and services;
8. using analytics to identify usage trends and determining the effectiveness of campaigns;
9. allowing you to comment on our site;
10. dealing with queries and complaints;
11. personalising your experience on our site;
12. identifying fraudulent behaviour and ensuring our website and systems are secure.
13. If you object to our reliance on Legitimate Interests for any purpose please contact our DPO.

## Who may we share your data with?

### Aggregate information

We may share aggregated, non-personally identifiable information, such as demographics and website usage statistics, with auditors and other trade organisations.

### Auditing organisations

We may share your personal data with the Auditors so they can verify aggregated statistics about circulation and usage of our products, or review our policies, processes and procedures for compliance with relevant standards.

## What data is collected on our websites?

‘Cookies’ are small data files which are sent to your computer, mobile phone or other device so that the website can remember information about your browsing activity. We use cookies on our websites for a variety of purposes:

### Information storage and access

The storage of information, or access to information that is already stored, on your device such as advertising identifiers, device identifiers, cookies, and similar technologies.

### **Content selection, delivery, reporting**

The collection of information, and combination with previously collected information, to select and deliver content for you, and to measure the delivery and effectiveness of such content. This includes using previously collected information about your interests to select content, processing data about what content was shown, how often or how long it was shown, when and where it was shown, and whether you took any action related to the content, including for example clicking on content. This does not include personalisation, which is the collection and processing of information about your use of this service to subsequently personalise content and/or advertising for you in other contexts, such as websites or apps, over time.

### **Measurement**

The collection of information about your use of the content, and combination with previously collected information, used to measure, understand, and report on your usage of the service. This does not include personalisation, the collection of information about your use of this service to subsequently personalise content and/or advertising for you in other contexts, i.e. on other service, such as websites or apps, over time.

### **Personalisation**

The collection and processing of information about your use of this service to subsequently personalise advertising and/or content for you in other contexts, such as on other websites or apps, over time. Typically, the content of the site or app is used to make inferences about your interests, which inform Almetron Ltd selection of advertising and/or content.

### **Storage and retention of data**

Your information is collected and stored on our secure systems, mainly based in the UK and European Economic Area (EEA). Where we use third party service providers to store data, we have appropriate agreements in place to ensure that your personal data is protected. Your personal data may be transferred to a country outside the EEA if, for example, a supplier or service is based outside the EEA. We will take all steps reasonably necessary to ensure your data is treated securely, including ensuring the location has been granted 'adequacy status' by the European Commission, or using our agreement with the supplier contains model contractual clauses approved by the European Commission, or ensuring the company we are transferring the data to is certified under the EU-US Privacy Shield.

We hold personal data for a variety of different purposes and the length of time we keep your data will vary depending on the services or products we are providing. We will only keep your data for a reasonable period of time, which is based on the purpose for which we are using your data. Once that purpose has been fulfilled, we will securely delete that data or anonymise your information (so that we, or anyone else, can no longer tell that data relates to you) unless we are required to retain the data longer for legal, tax or accounting reasons.

## Security

We are committed to protecting the personal data we hold. In accordance with GDPR, we adopt appropriate technical and organisational measures to help prevent unauthorised access to your information and ensure data is held securely. We also require any third parties to whom we may transfer personal data to have appropriate security measures in place.

## Your rights

You have the right to request:

- Access to the personal data we hold about you.
- The correction of your personal data when incorrect, out of date or incomplete.
- The erasure of your personal data.
- That we stop using your personal data for direct marketing if you object to it.
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- The right to request a transfer of your data to another service provider.
- Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

## Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

## Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request. Remember, you can always stop direct marketing messages by getting in touch with us.

## Exercising your rights

If you wish to exercise any of your rights please contact the Data Protection Officer:

By post: Data Protection Enquiries, Almetron Ltd Limited, 24 Abenbury Way, Wrexham, LL13 9UZ

By email: [info@almetron.co.uk](mailto:info@almetron.co.uk)

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. If this is case, we will notify you and keep you updated.

### **No fee usually required**

You will not usually have to pay a fee to access your personal data (or to exercise any of the rights), however, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. If we choose not to action your request we will explain to you the reasons for our refusal.

### **Information Commissioner's Office**

If you feel you need to, you also have the right to make a complaint at any time to the ICO, the UK data protection supervisory authority ([www.ico.org.uk](http://www.ico.org.uk)).

### **Policy changes**

We may amend this Privacy Policy from time to time, so we encourage you to check it periodically. If we make material changes we will endeavour to provide you with appropriate notice before such changes take effect.

### **Further information**

General information about data protection may be found at the Information Commissioner's website: <https://ico.org.uk/>

For more information about cookies please visit <http://www.allaboutcookies.org/> and for more information about how to manage cookies please refer to our Cookies Policy.

Information about direct marketing may be found at the Direct Marketing Association's website: <https://dma.org.uk/>

**To unsubscribe from all emails contact [info@almetron.com](mailto:info@almetron.com)**

