

SPECTRA GROUP (UK) LIMITED – PRIVACY NOTICE

1. IMPORTANT INFORMATION AND WHO WE ARE

Spectra Group (UK) Limited is committed to protecting and respecting your privacy.

This notice (together with our [Terms of Use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By corresponding with us, doing business with us, visiting our website (at www.spectra-group.co.uk) or our offices, or otherwise engaging with us, you are accepting and consenting to the practices described in this notice.

For the purpose of the UK General Data Protection Regulation (UK GDPR), the controller (i.e. the entity that makes decisions about your personal data) is Spectra Group (UK) Limited of Bridge Court Barn, Kingstone, Hereford, HR2 9ES.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you. We have grouped this information together and set out how we collect it, as follows:

Type of data	How it is collected
Identity Data includes first name, last name, username or similar identifier.	<p>When you fill in forms or correspond with us by post, phone, email or otherwise, and visit our premises.</p> <p>This includes personal data you provide when you:</p> <ul style="list-style-type: none"> ● apply for our products or services; ● intend or agree to sell your products or services to us; ● subscribe to our service or publications; ● fill in our on-site visitor book; ● engage in an application and recruitment process with us; ● request marketing to be sent to you; or ● give us feedback or contact us.
Contact Data includes billing address, delivery address, email address and telephone numbers.	<ul style="list-style-type: none"> ● When you fill in forms or correspond with us by post, phone, email or otherwise. ● This includes personal data you provide when you: ● apply for our products or services; ● intend or agree to sell your products or services to us; ● subscribe to our service or publications; ● engage in an application and recruitment process with us; ● request marketing to be sent to you; or ● give us feedback or contact us.

Financial Data includes bank account and payment card details.	<p>When you fill in forms or correspond with us by post, phone, email or otherwise.</p> <p>This includes personal data you provide when you:</p> <ul style="list-style-type: none"> ● apply for our products or services; ● intend or agree to sell your products or services to us; ● subscribe to our service or publications; ● request marketing to be sent to you; or ● give us feedback or contact us.
Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.	<p>When you order/purchase our products and services.</p> <p>When we order/purchase your products and services.</p> <p>When you liaise with us regarding your orders/purchases, or orders/purchases we place with you, and the corresponding supply.</p> <p>When you provide your bank account and payment details in correspondence (including emails), quotes, proposals, purchase orders and invoices.</p>
Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.	<p>As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns.</p> <p>We collect this personal data by using cookies and other similar technologies (including Google Analytics).</p> <p>We may also receive Technical Data about you if you visit other websites employing our cookies.</p> <p>Please see our Cookie Policy for further details.</p>
Profile Data includes purchases or orders made by you, your interests, preferences, feedback and survey responses.	<p>When you purchase our products or services, and/or when you fill in a form or correspond with us to provide feedback or survey responses.</p>
Usage Data includes information about how you use our website, products and services.	<p>As you interact with our website, we will automatically collect Usage Data about your usage of our website. We collect this personal data by using cookies and other similar technologies (including Google Analytics).</p> <p>Please see our Cookie Policy for further details.</p>
Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.	<p>When you correspond with us by telephone, email (and other electronic communication), post or otherwise.</p> <p>When you sign-up to receive communications on, or to download a document from, our website.</p>
We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not	

considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.	
CCTV footage and other information obtained through electronic means such as swipe card records.	When you visit our premises.

Note that we do not collect data from third parties other than our contractors, agents and representatives with whom we have confidentiality undertakings.

3. WHERE WE STORE YOUR PERSONAL DATA

We keep your information both on our own and third-party-owned servers. Our own servers are based in the UK. Most of the third-party-owned servers we use are based somewhere in the UK or Europe, but some of these servers may be based in other countries.

Where any servers are based outside the UK or Europe, we make sure that the organisations which own them agree to follow similar rules to us when it comes to how your information is handled.

CCTV footage is stored on a removable storage device within an access-controlled secure room.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when we have a lawful basis (i.e. a legal reason) to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the **contract** we are about to enter into or have entered into with you.
- Where it is necessary for our **legitimate interests** (necessary business aims) (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a **legal obligation**.

By Legitimate Interests we mean the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Generally, we do not rely on consent as a legal basis for processing your personal data.

You have the right to ask us to stop sending you marketing information at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data where more than one basis has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or supplier	a) Identity b) Contact	Performance of a contract with you

To process and deliver your order including:	a) Manage payments, fees and charges b) Collect and recover money owed to us	a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications	a) Performance of a contract with you b) Necessary for our legitimate interests (to recover debts due to us)
To deliver support and training involving the export of controlled technology		a) Identity b) Contact	a) Necessary to comply with legal obligation
To manage our relationship with you which will include:	a) Notifying you about changes to our terms or Privacy Notice b) Asking you to leave a review or take a survey	a) Identity b) Contact c) Profile d) Marketing and Communications	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a survey		a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)		a) Identity b) Contact c) Technical	a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b) Necessary to comply with a legal obligation c) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller
To deliver relevant website content and		a) Identity b) Contact	Necessary for our legitimate interests (to

advertisements to you and measure or understand the effectiveness of the advertising we serve to you	c) Profile d) Usage e) Marketing and Communications f) Technical	study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a) Technical b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you.	a) Identity b) Contact c) Technical d) Usage e) Profile f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).
To promote a safe working environment and to monitor the safety and security of our premises. To assist in the prevention, investigation and detection of crime. To assist in the apprehension of offenders including the use of images as evidence in criminal proceedings. To assist in the investigation of breaches of our codes of conduct and policies by staff, and contractors. To investigate complaints.	a) Identity	a) Necessary for our legitimate interests (to protect our business and personnel, and to share any evidence of criminal activity with law enforcement authorities). b) Necessary to comply with a legal obligation (if we are required by a court order or we have a statutory duty to report potential criminal acts to a law enforcement authority).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We do not currently, nor have any plans to, share your personal data with any third party for marketing purposes and would seek your express prior consent if we decided to do this.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

5. WHO WE SHARE YOUR PERSONAL DATA WITH

We share (or may share) your personal data with:

- our staff (which may include self-employed consultants and contractors) and our technical service providers (e.g. our cloud service providers that host our business systems, our payment service providers);
- our group companies and their staff (and self-employed consultants and contractors), services providers, and professional advisers;
- organisations: we sometimes partner with third-party businesses in connection with product and/or service development and product manufacture, business development and sales of our products and services;
- our website hosting provider: the company who provides website hosting services to us may have access to some information (e.g. information from cookies and tracking technologies) to ensure that our website is working correctly;
- our cloud service providers, which we use to store information about our customers and which enables us to deal with enquiries and provide our services;
- our professional advisers, such as our accountants or legal advisors where we require specialist advice to help us conduct our business;
- any actual or potential buyer of our business;
- any regulatory authorities where we receive a request or are required to provide information (such as HMRC, the UK tax authority);
- law enforcement authorities where we intend to share evidence of suspected criminal activity (e.g. CCTV footage) with the police.

If we are asked to provide personal data in response to a court order or legal request (e.g. from the police), we would carefully consider the impact on your rights when giving a response.

6. TRANSFERS OF YOUR PERSONAL DATA OUTSIDE OF THE UNITED KINGDOM (UK)

Some of our external third party service providers are based outside the UK so their processing of your personal data will involve transfer of data outside the UK.

Where your personal data is transferred outside of the UK, we will ensure that (a) there are adequacy regulations with respect to the data protection laws of the country to which it is transferred; or (b) we have entered into a suitable data processing agreement, including where necessary specific contracts approved for use in the UK which give personal data the same protection it has in the UK, with the third party situated in that country to ensure the adequate protection of your data. In all cases, transfers outside of the UK will be protected by appropriate safeguards.

7. HOW WE KEEP YOUR INFORMATION SAFE

We have put in place appropriate security and safety measures to prevent your personal data from being lost or illegally accessed by those who do not have permission. These measures include:

- access controls and user authentication (including multi-factor authentication);

- internal IT and network security;
- regular testing and review of our security measures;
- staff policies and training;
- contractor policies;
- incident and breach reporting processes;
- business continuity and disaster recovery processes; and
- physical security, access controls and user authentication to business premises and paper records.

We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. We may also need to notify the regulator (where required under data protection law) and if we make decisions about personal data about your data jointly with another party (for example, if a third party marketing provider), we may need to notify them.

8. HOW LONG WILL WE USE YOUR PERSONAL DATA?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider:

- The amount, nature and sensitivity of the personal data.
- The potential risk of harm from unauthorised use or disclosure of the data.
- Whether the data continues to be required for a legitimate business reason.
- Whether we have a legal or contractual need to retain the data.

We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required in accordance with our notice. However, given the practical difficulties of removing all data from backups the principle we apply is that we will put such backups "beyond use".

By Law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. We may also have contractual obligations to retain data.

In some circumstances you can ask us to delete your data.

9. YOUR RIGHTS

The rights you have under data protection law are to:

- request access to your personal data ;
- request correction of your personal data;
- request erasure of your personal data;
- request restriction of processing your personal data;
- object to processing;
- request transfer of your personal data;
- the right to complain to a supervisory authority; and
- the right to withdraw consent.

1. **Your right to access your data.** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- your request not being found to be unfounded or excessive, in which case a charge may apply; and
- the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

We may withhold personal information that you request to the extent permitted by law.

2. **Your right to correction.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

3. **Your right to erasure.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

4. **Your right to restrict processing.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

5. **Your right to object to processing.** This enables you to object to us processing your data where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms, but we will notify you of this and explain our reasoning at the time.

6. **Your right to object for statistical purposes.** You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.

7. **Complaints.** We try our best to process personal data in a compliant and fair way, but if you think we have infringed data protection laws or your data rights, you can lodge a complaint with the Information Commissioner's Office (ICO), the UK regulator for data protection issues (ico.org.uk), but we hope we can assist you in the first instance.

8. **Exercising your rights.** You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

10. CONTACT

We are registered with the ICO under registration number ZA293327.

You can contact us:

- by post, using the postal address given above;
- using our website contact form;
- by telephone, on the contact number published on our website from time to time; or
- by email, using the email address published on our website from time to time.

11. DATA PROTECTION OFFICER

Our data protection officer's contact details are: Jim Boyle, who can be contacted via email: j.boyle@spectra-group.co.uk, or telephone: +44(0)845 260 0444.

12. CHANGES TO OUR PRIVACY NOTICE

Any changes we make to our privacy notice will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.