

Midtherm Laser Limited takes your privacy very seriously and will only use your data as detailed within this notice, to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately. We will never sell your data to third parties for marketing purposes. We collect and process data for the performance of contract and legal requirements, and on the grounds of legitimate interests. Data is kept for periods determined as necessary to meet business and legal requirements. We will not share your personal data with third parties other than those outlined in our privacy notice, and not for purpose of marketing.

Who We Are

Midtherm Laser Limited ('we' or 'us' or 'our') is committed to protecting your privacy. We gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws applicable to the United Kingdom. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Midtherm Laser Limited's registered office is at **Albion Works, Peartree Lane, Dudley, DY2 0UY**, and we are a company registered in England and Wales under company number **01876393**. We are registered on the Information Commissioner's Office Register; registration number **Z7734260**, and act as the **data controller and data processor** when processing your data.

If you wish to contact us to unsubscribe or make any other enquiry regarding our privacy policy please email us at:
GDPR-info@midthermlaser.co.uk

The data Midtherm collects

Midtherm Laser Limited processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we may typically collect is: -

- Name
- Home/Work Address
- Personal Email
- Business Email
- Home Telephone Number
- Business Telephone Number
- Mobile Telephone Number
- IP address
- CCTV including vehicle registration and visual identification
- Personal Preferences (e.g. Products)
- Customer Job Information (e.g. you may discuss particular jobs with our employees in order for the appropriate product to be supplied.)

We generally collect information in the below ways: -

- Via forms on our website
- Account application and management forms
- Verbally on the premises
- Verbally via telephone
- Verbally during exhibitions or on forms including digital formats during exhibitions
- From requests that you may make for further information from us
- Email/fax/post communication between us
- Via website usage
- Via social media (e.g. comments, messages)

How We Use Your Personal Data

Midtherm Laser Limited takes your privacy very seriously and will only use your data as detailed within this notice, to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately. We will never sell your data to third parties for marketing purposes. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice.

The purposes and reasons for processing your personal data are detailed below: -

- We collect and store your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address. To process your order and manage your account (as applicable).
- We collect and store your personal data to contact you for your views on our products and services and / or confirm your requirements for products, to notify you of new products and product developments. This may include arranging for a Midtherm Representative or Midtherm Sales Agent to contact you. This is done on the grounds of legitimate interests.
- We collect and store your personal data to contact you to notify you of price updates, important changes or developments to our site or services, to notify you of product literature updates to enable us to perform contract.
- We collect and store your personal data on the grounds of performance of contract to enable us to provide product warranties where applicable.
- Payment information will only be kept for the period necessary, e.g. credit card details to make an individual purchase will be used to process particular payments and then destroyed.
- We collect and store your personal data as part of our legal obligation for insurance purposes.
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes.
- We may share your information with the company insurance broker to enable them to carry out necessary processes to provide the company with appropriate liability insurances for which there is a legal obligation for us to hold.
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer. Such information will be non-intrusive and is processed on the grounds of legitimate interests. There is a facility to unsubscribe should you wish to do so.
- IP addresses are collected and stored by the company to anonymously track visitors for the purpose of enhancing system security. We also use Google Analytics to provide a more personalised online experience. These facilities are EU based. This is done on the grounds of legitimate interests.
- CCTV images including vehicle registration and visual identification are stored and processed where necessary to meet contractual obligations for insurance purposes, to meet legal obligations for authorities including police and HSE, to meet contractual obligations and on the grounds of legitimate interests for training and disciplinary procedures.
- We will contact you if required to fulfil contractual or legal obligations.
- We may share your personal data with selected third parties as and when required in the performance of contract. This includes, but is not limited to postal and delivery services, to suppliers to enable delivery direct to you, to suppliers for specialist finishing services.
- We may share your personal data with a selected third party who are a credit reference agency and provide us with financial background checks to be able to perform contract on an account basis and / or dependent upon size of the order (sale or purchase) and risk to us in the event of non-payment / supply failure.
- Data is not transferred to third parties for marketing purposes.
- To continue to meet legal, contractual requirements and on the grounds of legitimate interests, your data would be shared in the event of a full or partial sale of the business, or we transferred a substantial amount of our assets to another company, we would disclose your personal information to that purchaser to ensure continuity of contracts & relationships and to ensure that they would be able to comply with legal requirements and those required to perform contract as detailed throughout this privacy notice.

Your Rights

You have the right to access any personal information that we process about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

We do not do any automated decision making.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. We use third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and must comply with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

- Company Accountants
- Selected Credit Reference Agency – Credit reference purposes to enable us to perform contract and manage accounts
- Selected Postal Delivery Service – Postal delivery service relating to performance of contract
- Selected Courier – process necessary information relating to performance of contract
- Selected Business Partners – process necessary information relating to performance of contract
- Selected Solicitors – process necessary information relating to performance of contract and to comply with legal obligations
- Selected Insurers and Insurance Broker – to comply with legal obligations, e.g. in the event of a claim, information relating to the contract will be shared.
- Selected Recruitment Agencies
- Governing bodies - to comply with legal requirements
- Service providers and other third parties, that are GDPR compliant, as reasonably necessary or prudent to provide, maintain and support our services, such as, for example, accounting software and IT support providers, payment processors, or Web hosting providers, to comply with legal requirements, requirements relating to performance of contract and legitimate interests.
- To a purchaser of the whole or part of the business – to comply with legal requirements, contractual requirements, and to continue operations in line with determined legitimate interests.
- IT Service Providers
- H&S Service Providers

Safeguarding Measures

Midtherm Laser Limited takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

SSL, TLS, Encryption, Restricted Access, Authentication, Subscription Updated Firewalls and Antivirus, Encrypted Backups

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Midtherm Laser Limited does not transfer or store any personal data outside the EU.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Midtherm Laser Limited, however, as this information is required for us to provide you with our services / deliver our products to you / keep you informed of pricing and product developments / notices of promotions, we will not be able to offer some / all our services without it.

Legitimate Interests

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

How Long We Keep Your Data

Midtherm Laser Limited only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 7 years. Hard copies and digital copies will be kept for the periods deemed necessary to meet legal, contractual and business requirements.

Special Categories Data

Owing to the products and services that we offer, Midtherm Laser Limited sometimes needs to process sensitive personal information (known as special category data) about you, to perform contract. Where we collect such information, we will only request and process the minimum necessary for the specified purpose e.g. to make a credit card payment to perform contract.

Marketing on the grounds of LEGITIMATE INTERESTS

Midtherm Laser Limited will occasionally send you price updates, design and development updates including details of new services available, notifications of changes to services available, details of promotions by email/SMS/post that have been identified as being beneficial to our customers. Such information will be relevant to you as a customer and non-intrusive and you will always have the option to decline this material at any time.



Consent

Midtherm Laser do not currently rely on requesting consent for processing as detailed in this Privacy Notice.

CCTV

Midtherm Laser Limited use CCTV on all sites in designated areas internally and externally to assist with site security, safety of employees, and business requirements. The information may be shared with authorities e.g. Police, HSE, or with employees involved for training, process management or disciplinary purposes, or with the company insurance broker. Data is retained on average for approximately 7 days depending upon activity in the period and storage available (maximum 30 days), at which point it is overwritten. There are no backups held for CCTV footage.

Other Privacy Notices

Our Cookie Notice is displayed separately online.

Our Website Privacy Notice is displayed separately online.

Our Employee Privacy Notice is available from the HR department.

Our privacy notice may also be communicated via: -

- Link on email correspondence
- Customer account application forms

Lodging a Complaint

Midtherm Laser Limited only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Midtherm Laser Limited

Mrs C E Birt

GDPR-info@midthermlaser.co.uk

01384 458 841

ICO Information Commissioners Office

0303 123 1113.

Changes to our privacy notice

Any changes to our privacy notice will be available via the website or by email/fax/post. We may choose to inform you directly of an updated policy if changes are significant.