

SHAREHOLDERS PRIVACY NOTICE



Last updated October 2019

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This Shareholders Privacy Notice sets out what personal data Cross Manufacturing Company (1938) Ltd (the "Company") hold about you and how we collect and use it, whilst you are a shareholder of the Company and after you have disposed of your shares. It applies to current and former shareholders of the Company (referred to as 'Shareholders' or 'you').

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other information that we might give you from time to time about how we collect and use your personal data.

This Privacy Notice applies from 25 May 2018, when the General Data Protection Regulation came into force. We may update this Privacy Notice at any time.

Who is the controller?

Cross Manufacturing Company (1938) Ltd is the "controller" for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

What type of personal data do we hold about you?

Personal data means any information relating to a living individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number). It can be factual (e.g. contact details or date of birth), an opinion about an individual's actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

We hold and use various types of personal data about you, including: name, postal address, shareholding, contact details, gender and financial data including bank account details.

Data protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data that is used to identify an individual is known as **special category** data. (The rest is **ordinary personal data**).

We do not hold any special category data about you.

Why do we hold your personal data and on what legal grounds?

We hold and use your ordinary personal data for company secretarial purposes.

Data protection law specifies the legal grounds on which we can hold and use personal data.

Most commonly, we rely on one or more of the following legal grounds when we process your personal data:

- Where we need it to comply with a legal obligation (**legal obligation**). Typically, this may include the legal obligation to provide information on shareholders to Companies House.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (**legitimate interest**). This may include, for example, managing a share register to ensure company secretarial obligations are fulfilled.



Cross Manufacturing Company (1938) Ltd.
Head Office, Midford Road, Bath,
BA2 5RR, England

Tel: +44 (0) 1225 837000
Fax: +44 (0) 1225 834115

Email: mail@crossmanufacturing.com
Web: www.crossmanufacturing.com

The Appendix to this Privacy Notice sets out in more detail the types of ordinary personal data we collect and hold about you, what we use it for, who we share it with and the relevant legal grounds under data protection law for doing so.

How do we collect your personal data?

You provide us with the personal data about you that we hold and use.

If you give us someone else's personal data

Sometimes, you might provide us with another person's personal data, for example when you transfer shares to another individual. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

Who do we share your personal data with?

We will only share your personal data with third parties where we have an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information (e.g. to Companies House for Company Secretarial purposes), or where it is necessary in our legitimate interest (e.g. to an IT service provider for maintenance of our shareholder database).

Further details of who we share your personal data with, and our purposes and legal grounds for doing so, are set out in the Appendix to this Privacy Notice.

Consequences of not providing personal data?

We only ask you to provide personal data when we have a good reason and there may therefore be consequences if you do not provide particular information to us.

We may require you to provide other personal data, where it is necessary for us to pay your dividend to you or where our use of the data is necessary in our legitimate interests.

If you choose not to provide us with personal data requested, we will tell you about the particular implications of any such decision at the relevant time.

How long will we keep your personal data?

We will not keep your personal data for longer than we need it for our legitimate purposes.

We take into account the following criteria when determining the appropriate retention period for Members' personal data:

- The amount, nature, and sensitivity of the personal data;
- The risk of harm from unauthorised use or disclosure;
- The purposes for which we process your personal data and how long we need the particular data to achieve these purposes;
- How long the personal data is likely to remain accurate and up-to-date;
- For how long the personal data might be relevant to possible future legal claims;
- Any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept.



The Tables in the Appendix to this Privacy Notice identify retention periods applicable to your personal data, which have been determined on the basis of the above criteria and which represent the longest period for which we will ordinarily keep it. We may often keep particular items of your personal data for less time. However, there may also be circumstances in which it is appropriate for us to keep particular items of your personal data for a longer period than that set out in the Tables. In particular, we will always keep your personal data for so long as we are required to do so under legal, accounting, reporting or regulatory requirements.

Transferring personal data outside the EEA

An overseas transfer of personal data takes place when the data is transmitted or sent to, viewed, accessed or otherwise used a different country. Data protection law restricts transfers of personal data to countries outside of the European Economic Area (EEA) because the law in those countries might not provide the same level of protection to personal data as the law in the EEA. We currently do not transfer any of your personal data outside of the EEA.

Your rights

You have a number of legal rights relating to your personal data, which are outlined here:

- **The right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **The right to request that we delete or remove** personal data that we hold about you 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 exercised your right to object to processing (see below).
- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- **The right to request that we restrict our processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to request that we transfer** your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).
- **The right to object to a decision** based on profiling/solely automated decision-making, including the right to voice your opinion, and obtain human intervention in the decision-making.

If you would like to exercise any of the above rights, or you have any questions about how your personal data is being used by us, you can contact our Contracts Administrator: Ashley Canavan

By email: Ashley.Canavan@crossmanufacturing.com;

By Post: Midford Road, Combe Down, Bath, BA2 5RR in writing.

Note that these rights are not absolute and in some circumstances we may be entitled to refuse some or all of your request.

Note too that you have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>



Appendix - Further details

This section of the Privacy notice tells you in more detail about the type of personal data we hold about you, what we use it for, our legal grounds for doing so, who we share it with and how long we keep it.

Please note that we will not necessarily hold, use or share all of the types of personal data as described in this Appendix in relation to you.

Note also that the first Table below divides items of personal data into relatively broad categories (under the heading "Type of ordinary personal data held by us". Where multiple purposes and/or legal grounds for our use of a given "type" of personal data are identified, this does not necessarily mean that all of the purposes and/or legal grounds are applicable to all items of personal data falling within that "type" of personal data.

More information about your ordinary personal data

Type of ordinary personal data held by us	What we use it for	Legal ground	Guideline retention period
Biographical details (including name, title, contact details, DOB, gender)	For effective communication with Shareholders and maintenance of our share register for Companies House.	Legal obligation Legitimate interest	Indefinitely
Date of entry on share register and date of ceasing to be a member.	For the purposes of administering the share register for Companies House.	Legal obligation Legitimate interest	Indefinitely
Financial Data and Details (e.g. bank account details)	For the purposes of administering the share register for Companies House and paying out dividends.	Legitimate interest	Indefinitely
Details of shareholding and transactions.	For the purposes of administering the share register for Companies House.	Legal obligation Legitimate interest	Indefinitely

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More information about how we share your personal data

Who we share your personal data with	What data we share	Why we share it	Legal ground
Companies House	Any of your personal data that is relevant.	Legal obligation to submit details of shareholdings to Companies House.	Legal obligation
Software provider	Any of your personal data that is relevant.	To effectively manage our share register.	Legitimate interest to use software to manage our share register.
Bank and Bacs provider	Details of your dividend payments and bank details.	To effectively manage payment of dividends.	Legitimate interest
Our legal and other professional advisers appointed from time to time.	Any of your personal data that is relevant. Please note that such personal data is not provided on a routine basis.	To obtain legal or other professional advice about matters related to shareholders.	Legal obligation In our legitimate interest to seek professional advice to manage the business and its finances.
Details of shareholding and transactions.	Name, address, shareholding and any of your personal data that is relevant. Please note that such personal data is not provided on a routine basis.	To comply with regulatory and legal obligations.	Legal obligation

