CUSTOMERS, SUPPLIERS& VISITORS PRIVACY NOTICE



Last updated October 2019

Page 1 of 2

This Privacy Notice sets out what personal data Cross Manufacturing Company (1938) Ltd (the "Company") hold about you and how we collect and use it. It applies to our prospective, current and future customers, suppliers and partners, as well as visitors to the Company's premises (referred to as '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 comes 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?

The Company collects or may collect the following personal data:

- Names
- Contact details, including company name, email address, phone numbers and work address;
- Job title;
- Qualifications;
- Car registration numbers;
- CCTV Footage We operate CCTV on the outside and in the entrances to some of our buildings. The footage we
 record is used for the prevention and detection of crime. Where fixed CCTV cameras are operating, there will be
 signs clearly displayed.
- Any other information necessary for the Company's business purposes.

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

We hold and use your ordinary personal data for our business purposes. Such uses include:

- Determining suitability of companies and individuals to act as suppliers or partners;
- Communicating with customers, suppliers, partners or visitors;
- Maintaining records of visitors to the Company premises, for reasons of security and health and safety;
- Complying with applicable laws;
- Ensuring the security of company-held information;
- Legitimate interest in securing our premises and reducing theft; and
- Such other purposes as are reasonably required by the Company.

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 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). For example to ensure effective business operations.



How do we collect your personal data?

The Company collects data directly from you and your employer, as well as from publicly available sources (such as websites and marketing material) by means of forms, documents, meetings, phone calls, emails and CCTV cameras on entrances to our buildings.

Who do we share your personal data with?

We may share your personal information with our employees, contractors and other parties in the course of normal business, as well as for the purposes of:

- Facilitating communications between ourselves, customers, suppliers and partners;
- Demonstrating our supplier's capabilities to current and prospective customers;
- We will only share CCTV footage where we are legally obliged to do so, or where we are allowed to do so under exemptions in the Data Protection Act for example for the prevention or detection of crime.
- Such other purposes as are reasonably required by the Company

Consequences of not providing personal data

Failure to provide personal data above may result in an inability for the Company to work with you or communicate effectively.

How long will we keep your personal data?

The Company may retain your data indefinitely where it is not practical to separate your personal data from the substance of the communication or where your personal data is embedded as part of our systems. CCTV footage will be kept for 2 weeks when it will overwrite itself.

Transferring personal data outside the EEA

From time to time it may be necessary to transfer a limited amount of personal data outside of the EU in order to facilitate working with customers abroad.

Your rights

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

- Be informed about how we use your data is used;
- Access data that we hold about you;
- Rectify data held about you if it is inaccurate or incomplete;
- The deletion or removal of personal data where there is no compelling reason for its continued processing;
- Object to your data being processed on the grounds of the company's legitimate interest or the performance of a task in the public interest.
- You have the right to see footage that you appear in, you can make this request using the contact details below.

If you have any questions or concerns about how your personal data is being used by us, you can contact our Contracts Administrator: Ashley Canavan: <u>Ashley.Canavan@crossmanufacturing.com</u> Midford Road, Combe Down, Bath, BA2 5RR.

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

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