



# Privacy Statement

Acorn Surface Technology Ltd has a firm commitment to protecting and respecting your privacy. The following sets out the way in which we collect personal data from you, or that you provide to us, via our websites ([www.acornst.co.uk](http://www.acornst.co.uk)) and the purposes for which we process that data.

Please read this statement carefully, together with any other privacy notice we may provide when we are collecting or processing personal information about you, so that you are aware of our processes and practices regarding your personal data and how we will treat it.

Acorn Surface Technology Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy statement.

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

We have appointed a data protection officer (DPO) to oversee compliance with this privacy statement. Our data protection officer can be contacted via email - [GDPR.UK@acornst.com](mailto:GDPR.UK@acornst.com) or phone 01623 753107.

## Information we collect from you and how we use it

We may collect, store and use the following categories of personal information about you:

- Personal contact details, such as your name, title, address, telephone numbers and personal email addresses.
- Your job title and employer/workplace.
- Location of your employment or workplace.
- Information about any products and services that we offer that you purchase, search for or enquire about.
- Information about any training services we offer that you use, attend, or enquire about.

## How we collect and use your personal information

### Information you give to us

This is information about you that you provide to us when using our Websites or when you contact us. It includes information you give us when filling in forms on our Websites, or by corresponding with us by phone, e-mail or otherwise. The information may be, amongst other things, your name, and address, place of work, e-mail address and telephone number.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as supplying products to you) or we may be prevented from complying with our legal obligations.

### Information we receive from other sources

We may receive information about you if you use any of the other websites that we operate or other services we provide, for example if you attend one of our training events or exhibitions. We may share this data internally and combine it with information collected on our Websites for the purposes set out above. We would only use this information for direct marketing purposes if you have consented to us doing so.

We are working closely with third parties for our legitimate business purposes in order to obtain information about those who may need or be interested in our products and services. This may include information from publicly accessible sources. We will notify you if we have received information about you from such third parties, telling you where we obtained the information from, the categories of information given to us and the purposes for which we intend to use that information. We will only use this information for direct marketing purposes if you have consented to us doing so.

## How we will use your personal information

We will only use your personal information when the law allows us to. Most commonly, we will use personal information we collect about you and your visit to our Websites in the following circumstances:



- to carry out our obligations arising under contracts we have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your own interests and fundamental rights do not override those interests (for example, to provide you with the information, products and services that you request from us, or for our internal business management and planning);
- where we need to comply with a legal obligation; and
- to notify you about changes to our products, services or this statement.

If you consent to us doing so, we will also use this information to provide you with:

- information about goods and services we offer that are similar to those that you have already purchased or enquired about
- information about other goods or services we offer that we feel may interest you
- pricing information
- information about our training services
- information about events we may hold or attend
- information about promotional programs we may be running from time to time.

If you do not want us to use your data in this way, or no longer want us to do so, please inform us of your preference by:

- contacting us at 01623 753107 or at [GDPR.UK@acornst.com](mailto:GDPR.UK@acornst.com)

All information collected about your visit to our Websites is gathered collectively rather than individually. We use this information:

- to help diagnose problems with our server and to administer our Websites, including improving our Websites and ensure that content is presented in the most effective manner for you and your computer;
- for our internal operations to allow us to determine statistical usage of the Websites and its associated pages and for research purposes. This allows us to see which areas are more popular than others on the Websites, the paths taken to reach each page, and it also allows us to gauge the effectiveness of any promotional programs we may be running at the time;
- to measure or understand the effectiveness of advertising we serve to you and others on our Websites; and
- as part of our efforts to keep our site safe and secure.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Disclosing your personal information to third parties**

We will share your personal information with third parties where required by law, where it is necessary to administer our business relationship with you or where we have another legitimate interest in doing so. This may include third-party service providers, advertisers and other entities in the Aalberts Group.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law. Any personal information you give to us will not be disclosed to any third party for the purpose of that third party contacting you to market its products or services to you.

We require all our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions. We do not envisage transferring your information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.



## Third-party service providers

Third-party service providers include our contractors, designated agents and other entities within our group. The following activities are carried out by third-party service providers:

- email management
- website development and design
- website hosting
- back up and administration services
- training certificate provision
- IT Services, Software suppliers and services
- System maintenance support and hosting of data

## Other entities in our group

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, to enable comparisons to be made (for example across different markets), or in the context of a business reorganisation or group restructuring exercise.

## How we protect your information

All information you provide to us is stored on our secure servers

We have put in place measures to protect the security of your personal information. Once we have received your information, we will use strict procedures and security features to try to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Websites; any transmission is at your own risk.

## How long we keep your personal data

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in on request by contacting [GDPR.UK@acornst.com](mailto:GDPR.UK@acornst.com)

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 your personal data, the purposes for which we process it and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## Your rights

You have several rights in law to control your personal information in certain circumstances.

- You have the right to ask us not to process your personal data for direct marketing purposes. We will not use your data for such purposes unless you have consented to us doing so. You can exercise your right to prevent all or some types of such processing by contacting us at [GDPR.UK@acornst.com](mailto:GDPR.UK@acornst.com)



Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. You also have the right to ask us to delete or remove your personal information in these circumstances.

- You have the right to request access to the personal information we hold about you (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- You have the right to request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- You have the right to request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- You have the right to object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes (see above).
- You have the right to request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- You have the right to request that your personal information be transferred to another person (portability).

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another person, please contact us in writing at [GDPR.UK@acornst.com](mailto:GDPR.UK@acornst.com) or at Acorn Surface Technology Ltd, Field Industrial Estate, Clover Street, Kirkby in Ashfield, Nottingham, NG17 7LJ.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your business relationship with us.

## **Children's Guidelines**

The Acorn Surface Technology Website is not intended for use by children. However, it will not contain links, visible or otherwise, that are unsuitable for children.

## **Changes to this statement**

We reserve the right to change or update this privacy statement at any time. Any changes we make in the future will be posted on this page. Please check this page frequently to see any such changes or updates.

Where appropriate, substantial changes will be notified to you by email if you have provided us with your email address. We may also notify you in other ways from time to time about the processing of your personal information.

## **Contacting us and complaints**

If you have any questions about this privacy statement, the practices of our Websites, or your dealings with our Websites, please contact us at 01623 753107, at [GDPR.UK@acornst.com](mailto:GDPR.UK@acornst.com) or at Acorn Surface Technology Ltd, Field Industrial Estate, Clover Street, Kirkby in Ashfield, Nottingham, NG17 7LJ. Your questions and comments are welcomed.

If you wish to raise a complaint about our collection, storage or use of your personal information please contact our data protection officer (DPO) Karen Swain at [GDPR.UK@acornst.com](mailto:GDPR.UK@acornst.com). 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.