

Tor Coatings Ltd

Privacy Notice

For the purposes of applicable data protection and privacy laws, Tor Coatings Ltd (“Company”, “us”, “we”) is considered the “Data Controller” in respect of the Personal Data that it collects, uses and manages in accordance with this Privacy Notice (“**Notice**”).

Company is part of a multinational group of affiliated companies that has databases in different countries, some of which are operated by affiliates and some of which are operated by third parties on behalf of Company or its affiliates.

Protecting your privacy is important to us. We are committed to protecting all Personal Data provided to us, whether by individuals with whom we do business, visitors to and users of our websites or otherwise. Personal Data is information which relates to an identified or identifiable living individual, and that identifies the individual, whether directly such as by name, mailing address or email address, or indirectly such as by internet protocol (IP) address, telephone number, age range, etc. Personal Data is obtained via site usage tracking or when you voluntarily provide the information to us, such as, for example, by filling in forms on the website.

This Notice explains what Personal Data and Non-Personal Data we collect both on this Site and otherwise, how we may use and manage it and the rights you have in relation to your Personal Data. Before you provide us with any Personal Data or browse our website, you should read through this Notice in full and make sure that you are comfortable with our privacy practices.

Please note that our website may contain links to other websites. These third party sites are not subject to this Notice and we recommend that you check the privacy and security policies of each website that you visit. We are only responsible for the privacy and security of the data that we collect and have no control over the actions of any third parties in relation to your Personal Data.

Please refer to the Glossary below for an explanation of the defined terms in this Notice.

Whose Personal Data do we collect?

Company collects Personal Data from a range of individuals in the context of its business activities, including:

- Employees;
- representatives of our suppliers, customers and other business contacts;
- contractors;
- users of our website;
- consumers;
- individuals who contact us by any means; and
- job applicants.

How we collect your Personal Data

We obtain Personal Data which you knowingly and voluntarily disclose to us, both in an online and offline context. For example, we collect Personal Data when you:

- visit our website and / or complete one of our web forms (e.g. using our “Ask the Expert” service);
- contact our customer service centers or request information from us in any other way;
- visit our premises;
- submit an order to us;
- give us your contact information via business card or otherwise;
- complete a survey;
- communicate with us via social networking websites, third party apps or similar technologies;
- visit one of our trade counters at an exhibition.

We may also collect information received by us from third party sources, for example relating to your use of other websites which we operate and from related third parties such as sub-contractors.

What Personal Data we Collect

Company may collect a range of Personal Data from you, such as your name, gender, job title, photographic identification, email address, phone number, home or business address and other contact details, details of your interests, communications with you (including notes from calls or meetings) and financial and payment information.

When you use our Site, we collect certain standard information that is sent by your browser to our Site. This includes technical information, such as your IP address, browser type, operating system, language, time zone setting, access times and any referring website addresses.

The purposes for which we process your Personal Data

We process your Personal Data for the following purposes:

- to provide you with information about, and to fulfil your requests for, products and services;
- to answer your questions;
- to conduct research and advertising;
- to contact you about improved products or product uses;
- to provide you with e-newsletters;
- to email you;
- to allow you to participate in online support or “Ask the Expert” services;
- to notify you of any changes to your services and to provide you with information in relation to similar goods and services that may be of interest;
- to administer and manage warranties;
- to communicate with you and third party contacts;
- to enable your participation in promotions, sweepstakes or consents;
- to administer our website and help improve our products and services;
- to allow you to report problems with our website;
- to carry out analytics in relation to the use of our website;

- to comply with applicable laws and regulations; and
- other business-related purposes, including negotiating, concluding and performing contracts, managing accounts and records, customizing Licensed content (as defined in the site Terms of Use), supporting corporate social responsibility activities, legal, regulatory and internal investigations, general business purposes and debt administration.

Please note that you cannot communicate with us through the “Contact” or support links on the website or via e-mail without providing some personal information. If you contact us or our service providers, a record of that session or correspondence will be maintained.

Recruitment

When you apply for a job via our website or otherwise, we will collect additional more specific Personal Data about you, such as your qualifications, career history, third party references and interview notes. We may also ask you for other information, for example your interests and the types of jobs you are interested in. Any Personal Data you provide to us in relation to a job vacancy will be processed in accordance with this Notice.

The legal basis for Company processing your Personal Data

In order to comply with applicable data privacy laws, Company is required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we collect and use your Personal Data, as set out above, the legal basis for Company processing your Personal Data will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- Company or our third parties’ legitimate business interests (for example, in maintaining and promoting our business by providing customers with feedback opportunities); or
- compliance with our legal obligations.

With Whom we share your Personal Data

We are part of a multinational group of affiliated companies that has databases in different countries, some of which are operated by affiliates and some of which are operated by third parties on behalf of Company or one of our affiliates. We may transfer your data to one or more such databases outside your country of domicile, potentially including countries which may not require an adequate level of protection for your personal information compared with that provided in your country. However, Company and its affiliates have established controls as required by applicable law to safeguard the possession of, and transfer of, Personal Data. The following are examples of how and why your Personal Data may be shared:

Company may share your Personal Data with people within our parent company, subsidiaries and affiliates who have a “need to know” that data for business or legal reasons, for example, in order to carry out an administrative function such as processing an invoice, or to direct a query that you have submitted to the relevant department or affiliate.

We may disclose your Personal Data to third parties including the authorities, Company's advisors, suppliers of IT services and third parties engaged by Company or its affiliates for the purpose of providing services requested by you; to protect any intellectual property rights in any materials displayed on or otherwise available from Company's website; for the purposes of seeking legal or other professional advice; to respond to a legal request or comply with a legal obligation; or to enforce Company's website Terms and Conditions of Use.

We may disclose your Personal Data to third parties in the event that we sell, buy or merge any business or assets, including to the prospective seller or buyer of such business or assets.

With your consent, we may disclose your Personal Data to third parties who offer products that may be of interest to you. These companies may then contact you directly with product or sample offers, personalized offers and information or to ask for your feedback on products and programs that may be of interest to you.

Because Company operates globally, and as previously explained, we may share the Personal Data you submit to us with any affiliate anywhere in the world. These entities are required to maintain the confidentiality of your data and are restricted from using it for any purpose other than the purposes set out in this Notice.

We may decide to allow users to share comments, postings, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Our employees may use personal devices to access our systems containing your Personal Data, thus your Personal Data may be transferred through or to service providers who contract with our employees for cellular data, for example.

We may be required to share your Personal Data in order to comply with a court order, law, or legal process, including to respond to government or regulatory requests. Disclosure may also be necessary if we have reason to believe that disclosure is necessary to identify, contact or bring legal action to enforce any of Company's rights, including against you or a third party, for non-payment, violation of any agreement with us. We may share your Personal Data to protect the safety of Company, our customers or others; or to prevent injury to or interference with, our rights or property, or the rights or property of other Processors or anyone else that could be harmed by such activities.

Considerations for the Transfers of Personal Data

Please note that any person to whom Company may disclose your Personal Data under this Notice may be situated in a country other than your own and that such country may provide a lower level of data protection requirements than your own country. By agreeing to this Notice, you consent to the transfer of your Personal Data to a country other than your own.

As stated above, whenever we transfer Personal Data across borders, we take legally required steps to ensure that adequate safeguards are in place to protect your Personal Data and to make sure it is treated in accordance with this Notice. If you are located in the EEA or the UK,

you can request a copy of the safeguards which we have put in place to protect your Personal Data and privacy rights in these circumstances, using the email address provided below.

Security

Company takes reasonable technical and organisational security measures to protect Personal Data from accidental or unlawful destruction, accidental loss and unauthorised access, destruction, misuse, modification or disclosure.

Records Retention

We will keep your personal data for as long as we need it for the purposes set out above, and so this period will vary depending on your interactions with us. For example, where you have made a purchase with us, we will keep a record of your purchase for the period necessary for invoicing, tax and warranty purposes. We may also keep a record of correspondence with you (for example if you have made a complaint about a product) for as long as is necessary to protect us from a legal claim. Where we no longer have a need to keep your information, we will delete it. Please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

Your rights

Applicable data privacy laws give rights to individuals in respect of Personal Data that organisations hold about them. If you wish to:

- request a copy of the Personal Data that we hold about you; or
- request that we rectify, delete, or limit the processing of your Personal Data,

please submit your written request via dataprotection@tor-coatings.com.

If you decide that you do not want to receive commercial communications from us, whether by email, telephone or post, you can “opt-out” from receiving such communications by clicking on the “unsubscribe” link provided at the bottom of each commercial email and updating your preferences, or by contacting us at dataprotection@tor-coatings.com.

Accessing and Correcting your Information

Keeping your information accurate and up-to-date is very important. Inaccurate or incomplete information could impact our ability to delivery relevant services to you. Please let us know about any changes that may be required to your personal information via our [contact us](#).

Children

This Site is not intended for children, and we do not knowingly Process information of children under the age of thirteen (13) without the consent of their parents or legal guardians. In an instance where such information was collected, it would be purely accidental and unintentional.

Changes to this Notice

We reserve the right to modify or amend this Notice at any time by posting the revised Notice on our website. It is your responsibility to review the Notice every time you submit information to us or place an order.

Non-Personal Data Information & Cookies

Non-Personal Data information

Non-Personal Data Information is information that is about you but does not identify you as an individual, either directly or indirectly, such as your browser type, the URL of the previous web site you visited, your internet connection, the equipment you use to access the Site, etc. Company directly or through third parties may automatically collect certain types of Non-Personal Data information from you when you are using the Site. We may also collect Non-Personal Data that you voluntarily provide, such as information included in response to a questionnaire or survey.

We may share Non-Personal Data with other third parties that are not described above. When we do so we may aggregate or de-identify the information so that a third party would not be likely to link data to you, your computer, or your device. Aggregation means that we combine the Non-Personal Data of numerous people together so that the data does not relate to any one person. De-identify means that we attempt to remove or change certain pieces of information that might be used to link data to a particular person.

Except for any Personal Data Company may collect from you as described in this Notice, any material, information or other communication you transmit, upload or post to the website or email to Company (“Communications”) will be considered non-confidential and non-proprietary. Company will have no obligation to preserve the confidentiality or refrain from disclosing Communications. Company will have no liability for and will be free to copy, disclose, distribute, incorporate and otherwise use the Communications and all data, images, sounds, tests, product ideas, suggestions or enhancements, as well as anything embedded therein for any and all commercial or non-commercial purposes.

Cookies

In general, you may visit the Site without telling Company who you are or revealing personal information about yourself. However, Company and companies providing services to or on behalf of Company may use various technologies, such as cookies and web beacons (1x1 pixels), to collect non-personal information discernible as a result of your visit. We will explicitly request your consent to use cookies on our site. Cookies are used to collect general usage and volume statistical data. You may control the use of cookies at your browser (visit www.aboutcookies.org for more information); however, if you reject cookies some or all of your ability to use our site may be limited. In addition to using cookies, we use Google Analytics to analyze trends, administer the site, track movements around the site and gather demographic information about our user base as a whole. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>. They may also use and disclose non-personal information derived from our advertising campaigns for reporting purposes, for scheduling and optimization of content delivery and, of course, they may do so if they are required to do so by law. Company may use any information gained through the Site

for any legal purpose, including without limitation, for purposes of developing, using and making available to third parties (at no charge or for a fee) aggregated information regarding trends, products, security/privacy patterns and research, internal record keeping and reporting, measuring and reporting learning, performance and other statistical information concerning any aspect of the Site except that Company will not report aggregated data in a manner that reasonably permits such information to be identified with any user.

Our site may also include social media or lead generation features, such as Facebook or Twitter buttons and widgets, such as the share this button. These features may collect your IP address, which page you are visiting on our site and may set a cookie to enable the feature to function properly. Social media and lead generation features and widgets may be hosted by a third party. Your interactions with these features and widgets are governed by the privacy policy of the company providing it.

Social media features

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Questions and complaints

If you have a concern or complaint about how Company has used your Personal Data, as a first step, you should raise this in writing with Company, using dataprotection@tor-coatings.com.

If you are not satisfied with the handling of your concern or complaint by Company, you can escalate this to your national Data Protection Authority.

Last Updated May 2018

Glossary

Data Controller	A party that determines the purposes and means of data processing.
Data Protection Authority	The relevant supervisory authority with responsibility for privacy or data protection matters in the jurisdiction of Company and/or affiliate;
European Economic Area (EEA)	The EEA includes all European Union member states and Iceland, Liechtenstein and Norway.

Personal Data	Information which relates to an identified or identifiable individual (i.e. data about Company employees, contractors, applicants, employees of vendors and suppliers, contractors, customers, patients using our products and individuals who use our website or service centres). It includes names, addresses, email addresses, job applications, user account information, and correspondence. Personal Data can also include web browsing information (e.g. data associated with a particular cookie) and IP addresses, when such information can be linked to an individual.
Processing	<i>Doing anything</i> with Personal Data; this includes collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, or even deleting it.

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