

Bartington Group – Privacy Notice

Thank you for visiting our website www.bartington.com (the **Site**). This Notice sets out the basis on which any personal data provided to us by you, or received by us from third parties, will be used by us.

Please read this Notice carefully. In this notice, **We** refers individually and collectively to the members of the Bartington Group, comprising Bartington Holdings Limited (registration number 12752175) and its subsidiaries Bartington Instruments Limited (registration number 01938710) and Bartington Defence & Space Limited (registration number 09989530), each registered in the United Kingdom with its registered office address at Unit 10 Thorney Leys Business Park, Witney, Oxfordshire, OX28 4GG. We are the data controller(s) of personal data provided to us.

We have appointed a Data Protection Manager who is responsible for addressing data protection matters, including any questions you may have in relation to this Notice. You can contact our Data Protection Manager at dataprotection@bartington.com.

Summary

Full details are set out in the relevant sections of this Notice below, but in summary:

- we generally receive personal data relating to you directly from you. For example, we will receive that data if you contact us through the Site or otherwise, or if we do business with you;
- personal data may occasionally be provided to us by third parties with whom each of you and us have some form of relationship. For example, if we do business with your employer then they might provide us with your contact details;
- we use your data to improve our Site, conduct our business, keep appropriate records and meet our legal obligations;
- we only provide your personal data to third parties for our limited business purposes or as permitted by law. We don't share your data with third party advertisers. We may disclose personal data within the Bartington Group;
- we store data for specified periods for our limited business purposes;
- you have certain rights, prescribed by law, in relation to the processing of your data, such as rights to request access, rectification or deletion of your personal data;
- the Site uses cookies; and
- you can contact us to enquire about any of the contents of this Notice.

1. Our use of personal data

1.1 In this section we have set out:

- (a) the general categories of personal data that we may process;
- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process personal data; and

- (d) the legal bases of the processing. When we refer to a “legal basis”, we mean a lawful basis set out in Article 6 of the General Data Protection Regulation (**GDPR**) under which we conduct the relevant processing.

Personal data we obtain from you

Usage data

- 1.2 We may process data about your use of the Site (**usage data**). This may include your geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your use. This data is aggregated and anonymised in such a way that it contains no information relating to any identifiable individual: it’s not actually personal data but we mention it in this Notice for the sake of completeness. We process usage data for the purpose of improving our Site.

Correspondence data

- 1.3 We may process personal data contained in or relating to any communication that you send to us, whether through the Site, by email, or otherwise. All of this together is **correspondence data**. This may include the communication content and metadata associated with the communication, as well as any contact details you provide to us such as your name, email address, phone number, job title or address. We process correspondence data for the purposes of communicating with you and record-keeping. If you are a customer of ours, or have indicated your interest in our products, services or business, then we may also process correspondence data for the purposes of addressing your enquiry and providing you with occasional news about our products and services.

Account data

- 1.4 If we do business with you or your organisation, whether as a supplier or a customer, then we may process personal data such as your contact details for the purposes of setting up an account in our systems. We may also process personal data within all account-related correspondence and documents such as proposals or contracts, whether created by us or provided to us. We call all of this **account data**, and we process it for the purposes of providing our products and services, purchasing products and services, and account administration and record-keeping.

Transaction data

- 1.5 We may process personal data relating to transactions, such as bank account details, contact, address and delivery details or information in transactional documents like invoices or POs in relation to orders placed with or by us, or payments made to or by us (**transaction data**). The transaction data may be processed for the purpose of supplying or receiving the relevant products or services, making and receiving payments and record-keeping. **We do not collect or process credit or debit card details from users of our Site.** These are collected and processed by our payment processing service provider, PayPal (Europe) S.a.r.l. et Cie, S.C.A. (**PayPal**). For more information about how PayPal processes your information, please see <https://www.paypal.com/uk/webapps/mpp/ua/legalhub-full>.

Visitor data

- 1.6 We may process personal data relating to any visit you make to our premises, such as your vehicle registration number, contact details, role, the purpose of your visit or your movements around our site. We might also ask you to sign certain waivers or acknowledgements – for example, if you are going into areas with

electromagnetic equipment we might ask you to confirm you don't have a pacemaker. We call all of this **visitor data** and we will process it for the purposes of ensuring your visit is properly recorded and is safe.

Photos

- 1.7 We may process photos of individuals which have been provided to us or taken by us in connection with competitions, publicity or promotional activity. We will call this **photo data** and we will process it for the purposes of publicising and promoting our business and products.

Personal data we obtain from others

- 1.8 Your personal data may be provided to us by someone other than you: for example, by your employer, by an organisation with whom you and we are both dealing or by someone who wishes to refer you to us or vice versa. Normally this data will be correspondence data or account data as described above and will be processed by us for the purposes described above.

Our legal basis of processing

- 1.9 We will process personal data only on lawful bases. In particular, we will process personal data on the following lawful bases identified in Article 6 GDPR:
- (a) for the performance of a contract with you, or to take steps at your request prior to entering into a contract with you (Article 6(1)(b) GDPR). This may be our basis for processing correspondence data, account data, transaction data or visitor data;
 - (b) for our legitimate interests (Article 6(1)(f) GDPR). This may be our basis for processing:
 - i) correspondence, account and visitor data (as we have an interest in properly administering our business and communications, and in developing our business with interested parties);
 - ii) transaction data (as we have an interest in making and receiving payments promptly and in recovering debts);
 - iii) any personal data identified in this Notice where necessary in connection with legal claims (as we have an interest in the protection and assertion of our and your legal rights and the legal rights of others); and
 - iv) any personal data identified in this Notice in connection with backups of any element of our IT systems or databases containing that personal data (as we have an interest in ensuring the resilience of our IT systems and the integrity and recoverability of our data).

- 1.10 We may also process any of your personal data where necessary for compliance with a legal obligation to which we are subject (Article 6(c) GDPR), or in order to protect your or another individual's vital interests (Article 6(d) GDPR).

2. Providing your personal data to others

- 2.1 We may disclose your personal data to our insurers and/or professional advisers as necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

- 2.2 We may disclose personal data to our suppliers or subcontractors in connection with the uses described above. For example, we may disclose:
- (a) any personal data in our possession to suppliers which host the servers on which our data is stored;
 - (b) transaction data and billing contact details to our accountants;
 - (c) transaction data to PayPal (Europe) S.a.r.l. et Cie, S.C.A., our payment processing service provider, who may process certain information in taking payments from and making payments to you; and
 - (d) transaction data and other relevant personal data to third parties for the purposes of fraud protection, credit risk reduction and debt recovery.
- 2.3 We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions and applicable law.
- 2.4 We may also disclose your personal data where necessary for compliance with a legal obligation to which we are subject, or in order to protect your or another individual's vital interests.
- 2.5 We may disclose your personal data within the Bartington Group.
- 2.6 If any part of our business or operations is sold to, transferred to, or integrated with, another organisation (or if we enter into negotiations for those purposes), your personal data may be disclosed to that organisation.

3. International transfers of your personal data

- 3.1 In this section, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 3.2 Some of the third parties to whom we may transfer your personal data, discussed above, may be located outside the EEA or may transfer your personal data to their own service providers located outside the EEA. If so, then we will take steps to ensure that transfers made by us or our data processors will only be made to countries in respect of which the European Commission has made an "adequacy decision", will only be made with appropriate safeguards, such as the use of standard data protection clauses adopted or approved by the European Commission or the use of the EU-US Privacy Shield, or is otherwise lawful. You may contact us if you would like further information.
- 3.3 We may also transfer personal data outside the EEA from time to time:
- (a) with your consent; or
 - (b) at your request (for example, if you ask us to introduce you to one of our distributors outside the EEA).

4. Data security

- 4.1 We have put in place appropriate security measures to prevent your personal data from being lost, used, accessed, altered or disclosed by accident or without authorisation. In addition, we limit access to your personal data to those officers, employees and contractors who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

4.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

5. Retaining and deleting personal data

5.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.2 We will retain and delete your personal data as follows:

- (a) usage data which is anonymised (and therefore not personal data) may be retained by us indefinitely;
- (b) correspondence data which relates only to enquiries and not to a business relationship will be retained for the period of the enquiry or chain of correspondence and then deleted after twenty-four months. Due to the long lead times inherent in our customers' order and business processes, some correspondence relating to potential business relationships may be contained for longer periods;
- (c) account and transaction data, and correspondence data relating to our business relationship with you, will be retained for seven years after the end of the relevant business relationship (or, where the data relates to the supply by us of products or equipment to you, for up to ten years after that).

5.3 We may retain your personal data where necessary for compliance with a legal obligation to which we are subject, or in order to protect your or another individual's vital interests.

6. Amendments

We may update this Notice from time to time by publishing a new version on the Site. You should check occasionally to ensure you are happy with any changes to this Notice, although we will notify you of material changes to this Notice using the contact details you have given us.

7. Your rights

7.1 We have summarized below the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. You can read guidance from the Information Commissioner's Office at www.ico.gov.uk for a fuller explanation of your rights.

7.2 Your principal rights under data protection law are:

- (a) **the right to access:** you have the right to confirmation as to whether or not we process your personal data and, where we do, to access to the personal data, together with additional information including details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee;
- (b) **the right to rectification:** you have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed;
- (c) **the right to erasure:** in some circumstances you have the right to the erasure of your personal data. These might include if the personal data are no longer needed for the purposes for which they were processed or if the processing is for direct marketing purposes. However, there are some exclusions of

the right to erasure, such as where processing is necessary for compliance with a legal obligation or in connection with legal claims;

- (d) **the right to restrict processing:** in some circumstances you have the right to restrict the processing of your personal data. Where processing has been restricted, we may continue to store your personal data and will observe the restrictions on processing except in the case of processing permitted by applicable law (for example, in connection with legal claims or for reasons of public interest);
- (e) **the right to object to processing:** you have the right to object to our processing of your personal data on the basis of the legitimate interests pursued by us or by a third party. If you make such an objection, we will stop processing the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless the processing is for legal claims. You also have the right to object to our processing of your personal data for direct marketing purposes and if you do so we will stop processing your personal data for that purpose;
- (f) **the right to data portability:** if the legal basis for our processing of your personal data is consent, or the performance of a contract with you, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others; and
- (g) **the right to complain to a supervisory authority:** if you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.3 You may exercise any of your rights in relation to your personal data by written notice to us.

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

8.4 We may use these kinds of cookies:

- (a) **Strictly necessary cookies:** these cookies are essential to provide you with features available through our Site and to enable you to use them. For example, they allow you to log in to secure areas of our Site, help the content of the pages you request load quickly, and are needed to place orders through our Site. We only use these cookies to provide you with those features.
- (b) **Functionality cookies:** These cookies allow our website to remember choices you make when you use our website, such as remembering your login details. The purpose of these cookies is to provide you

with a more personal experience and to avoid you having to re-enter your preferences every time you visit our website.

- (c) **Analytical/performance cookies:** These cookies are used to collect information about traffic to our website and how users use our website. We use this information to help operate our website more efficiently, to gather broad information about visitors to our site (such as geographical location, visit times and bounce rates).

9. Cookies the Site uses

Some of the more significant individual cookies we use and the purposes for which we use them are:

Cookie Name	Purpose
Session, wc_session	This cookie is essential for our Site to operate. It allows us to remember your details during your current visit to our Site, and in particular to allow storage/retrieval of basket information (our website uses WooCommerce for its shop-front functions).
wc_fragments, wc_cart, woocommerce_items_in_cart	These cookies are essential to remember items a user has placed in a shopping cart and ensure that cart functionality works perfectly. It expires immediately after user leaves the site. Also stores a visitor's login information so they don't need to keep logging in if browser closed.
wmc_current_currency	This cookie stores the current currency for WooCommerce.
PayPal Cookies	These are essential for the payment processing features of our Site to operate, and allows you to log into and make and receive payments relating to the designs featured on our Site using your PayPal account.
Google Analytics	This is an analytical / performance cookie. The Site uses Google Analytics to help analyse how users use the Site, collecting standard internet log information and visitor behaviour information in an anonymised form from which no user is identifiable. This information is transmitted to Google and processed to compile statistical reports on activity on the Site. These reports allow us to optimise our user experience. Google provide a browser add-on for users who wish to prevent their data from being used by Google Analytics. Further information is available at https://tools.google.com/dlpage/gaoptout/ .
CONSENT, 1P_JAR	Set by Google. These functionality cookies relate to a unique ID for setting website preferences and web suite stats.
STACKSCALING	This functionality cookie is necessary for the cache function. A cache is used by the website to optimize the response time between the visitor and the website. The cache is usually stored on the visitor's browser.
wp-settings-4, wp-settings-time-4, wordpress_logged_in	These essential cookies relate to Wordpress and are used to check whether your web browser is set to allow or reject cookies and customize your view of website interfaces. They also indicate when you're logged in, and who you are, for most interface use.
wordpress_test_cookie	Used on sites built with WordPress. This essential cookie tests whether or not the browser has cookies enabled.
1P_JAR	Set by Google. A performance / analytical cookie which sets a unique ID for setting website preferences and web suite stats.
slimstat_optout_tracking	A performance / analytical cookie used by Slimstat to assist with monitoring overall website performance.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

9.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can obtain up-to-date information about blocking and deleting cookies at www.aboutcookies.org or at the support pages made available by your browser operator.

10. Our details

You can contact us:

- (a) by post at 5 Thorney Leys Business Park, Witney, Oxon OX28 4GE;
- (b) using the contact form on the Site;
- (c) by telephone at +44 (0)1993 706 565; or
- (d) by email at dataprotection@bartington.com.

11. Third Parties and Security

- 10.1 The Site may contain links to third party websites or refer to third party service providers and other entities. For example, we might refer you to training videos on YouTube. If you follow a link to any third party website or deal with any third party entity referred to on the Site, then you should note that these third parties may have their own privacy and cookie policies, and that we are not responsible for their use of any personal data which you may provide to them. You should ensure that you have read and understood any relevant policies.
- 10.2 Although we do our best to ensure the security of personal data provided to us (and to use only reputable service providers), any transmission of data via the Internet is by its nature insecure and we cannot guarantee the security of any personal data you provide to us.

Last updated: 17th September 2020