

**INSTRUMENT
TRANSFORMERS^{Ltd.}**

GDPR Customer Privacy Notice

The Company gathers and processes your personal information in accordance with this Privacy Notice and in compliance with the General Data Protection Regulations (GDPR) and other relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

The Company's registered office is at 2/4 Lithgow Place, East Kilbride, G74 1PW. Scotland, United Kingdom and we are a company registered in Scotland under company number SC054448. We are registered on the Information Commissioner's Office Register; registration number ZA238535 and act as the Data Controller when processing your data. Our designated Data Protection Officer is Paul Munro, who can be contacted at 2/4 Lithgow Place, East Kilbride G74 1PW. Scotland. United Kingdom.

Information That We Collect

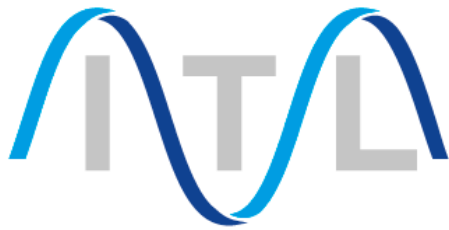
We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect is:

- Business Name
- Buyer Business Address
- Buyer Business Email
- Buyer Telephone Number
- Mobile Telephone Number (where necessary)
- Buyers Contact person(s) contact information
- Invoice Business Address
- Invoice Business Email
- Invoice Telephone Number
- Invoice/Accounts Business Email
- Delivery Address
- Delivery Contact Details (where necessary)

We collect information in the following ways:

- Credit application form
- Company purchase order
- Product Enquiry
- Technical Communications
- Email Communications



**INSTRUMENT
TRANSFORMERS ^{Ltd.}**

How We Use Your Personal Data

The Company takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We retain your data only for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below:

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.

Your Rights

You have the right to access any personal information that we process about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

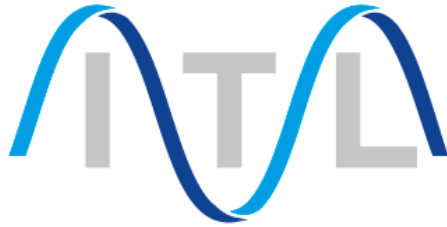
If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible, but certainly within legal timeframes, unless there is a valid reason for not doing so, in which case you will be notified.

You also have the right to request erasure of your personal data or to restrict in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request. This is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal



**INSTRUMENT
TRANSFORMERS ^{Ltd.}**

requirement. We may use third parties to provide the below services and business functions; however, all processors acting on our behalf process your data only in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

IDS & Company - (Company Accountants)
WorldPay – (Online Payment Transactions Only)

Safeguarding Measures

We take your privacy seriously and take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including:

- Firewalls
- Malware
- Anti-virus
- Spyware
- Software and operating systems updates
- Individual login and password
- Daily backups removed from premises
- Secure drives
- Secure archiving
- Card details are not retained

Our email hosting & archiving servers are in Dublin (Ireland) & Amsterdam (The Netherlands) and include Amazon, IBM & Microsoft.

Our website is hosted on servers located in Scottsdale Arizona (USA),

Our online payment servers are hosted by WorldPay.

Under GDPR these organisations would be considered Sub-processors.

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. We do not transfer or store any personal data outside the EU.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to us. However, as this information is required for us to provide you with our services, we will not be able to offer some/all our services without it.



**INSTRUMENT
TRANSFORMERS ^{Ltd.}**

Legitimate Interests

As noted in the *'How We Use Your Personal Data'* section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for and have identified that our interests are the management of providing services for customers.

How Long We Keep Your Data

We only ever retain personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We will keep your data on our systems for as long as a relationship exists between us, unless you ask us specifically to remove your details.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Lodging A Complaint

We process your personal information only in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Information Commissioner's Office (ICO),
Wycliffe House,
Water Lane,
Wilmslow
Cheshire
SK9 5AF

Tel: +44 (0) 303 123 1113

<https://ico.org.uk/global/contact-us/email/>