

## **Introduction**

This is the privacy policy for Washington Mills Electro Minerals Limited (company number: 01436144 of 64 Mosley Road, Trafford Park, Manchester, M17 1NR) (“we”, “us”, “our”).

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: [LINK](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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## **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **Purpose of this privacy policy**

This privacy policy aims to give you information on how we collect and process your personal data including through your use of our website, (including but not limited to) any data you may provide whether directly to us or through this website when you:

- purchase any product or service (including contacting our helpdesk or sales team);
- sign up to receive any literature or newsletters; or
- leave any message on our message board or submit curricula for the purpose of applying for any career opportunities posted on the website.

**Please note: This website is not intended for children and we do not knowingly collect data relating to children.**

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Controller**

We are the data controller for the purposes of the General Data Protection Regulation (EU 2016/679) and are responsible for your personal data.

Our HR / Safety Manager is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (as detailed below), please contact our HR / Safety Manager using the details set out below:

- Full name of legal entity: Washington Mills Electro Minerals Limited
- Email address: [info@washingtonmills.co.uk](mailto:info@washingtonmills.co.uk)
- Postal address: 64 Mosley Road, Trafford Park, Manchester, M17 1NR
- Telephone number: 0161 873 5500

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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated in July 2018.

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

## Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

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

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- "Identity Data" includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- "Contact Data" includes billing address, delivery address, email address and telephone numbers.
- "Financial Data" includes bank account and payment card details.
- "Transaction Data" includes details about payments to and from you and other details of products and services you have purchased from us.
- "Technical Data" includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- "Profile Data" includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- "Usage Data" includes information about how you use our website, products and services.
- "Marketing and Communications Data" includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share "Aggregated Data" such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any "Special Categories of Personal Data" about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms on the website or sending us emails or providing such data over the telephone in order to achieve any of the purposes listed in paragraph 1 of this policy (*Purpose of this privacy policy*).
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy [LINK](#) for further details.
- **Third parties.** We may receive your data from our group companies.

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal obligation.

Click here [LINK TO GLOSSARY LINK TO LAWFUL BASIS](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

We will obtain your consent to process your personal data when you register to use the website and we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [info@washingtonmills.co.uk](mailto:info@washingtonmills.co.uk).

## **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity  (b) Contact	Performance of a contract with you
To process and deliver your order including to manage payments, fees and charges, and to collect and recover money owed to us.	(a) Identity  (b) Contact  (c) Financial  (d) Transaction  (e) Marketing and Communications	<ul style="list-style-type: none"> <li>▪ Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
To manage our relationship with you which may include notifying you about changes to our terms or privacy policy, or asking you to leave a review or take a survey	(a) Identity  (b) Contact  (c) Profile  (d) Marketing and Communications	<ul style="list-style-type: none"> <li>▪ Performance of a contract with you</li> <li>▪ Necessary to comply with a legal obligation</li> <li>▪ Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity  (b) Contact  (c) Technical	<ul style="list-style-type: none"> <li>▪ Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>▪ Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website content and advertisements to you and	(a) Identity	<ul style="list-style-type: none"> <li>▪ Necessary for our legitimate interests (to study how customers use our products/services, to</li> </ul>

measure or understand the effectiveness of the advertising we serve to you	(b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	develop them, to grow our business and to inform our marketing strategy)  ▪ Consent
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	▪ Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)  ▪ Consent

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will never send out your information to third parties or add you to any marketing mail list without your prior express consent. Such consent can be withdrawn at anytime by contact us at [info@washingtonmills.com](mailto:info@washingtonmills.com).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have opted in to receiving that marketing.

## Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

## **6. INTERNATIONAL TRANSFERS**

We will ensure that, to the extent that any personal data originating from the UK or European Economic Area (EEA) is transferred to a country or territory outside the UK or EEA that has not received a binding adequacy decision by the European Commission or a competent national data protection authority, such transfer will be subject to appropriate safeguards that provide an adequate level of protection in accordance with the General Data Protection Regulation (GDPR).

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties 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.

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.

## **8. DATA RETENTION**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are:

You have the right to:

- 9.1 Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 9.2 Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 9.3 Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 9.4 Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 9.5 Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 9.6 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated

information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- 9.7 Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### **No fee usually required**

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

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. GLOSSARY**

### **LAWFUL BASIS**

"Legitimate Interest" means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

"Performance of Contract" means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

"Comply with a legal obligation" means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## **THIRD PARTIES**

### **Internal Third Parties**

Other companies in the Washington Mills group of companies acting as joint controllers and who are based in the United States of America, Canada and Norway and provide IT, administration and/or client relationship management services and/or undertake leadership reporting.

### **External Third Parties**

- Service providers acting as processors based in the United Kingdom who provide IT and system administration, payroll and pension services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.