

ITW Construction Products Company Privacy Notice

Last updated: 23/05/2018

ITW Construction Products respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

This Privacy Notice only applies to personal information that we collect through our websites at www.itwcp.com, www.itwcp.co.uk and www.itwcp-offsite.co.uk. For personal information that we collect when you use or interact with our services, please see our services privacy notice below.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at chapter 11 below.

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1. The personal information we collect and why

The personal information that we may collect about you through the Website broadly falls into the following categories:

Information that you provide voluntarily

Certain parts of our Website may ask you to provide personal information voluntarily, such as through completing a Web form:

- Title, first name and last name;
- Company name, address and country;
- Personal contact information (phone, email, fax, etc.);

- Name, address, department, contact information and other information in relation to a company that you represent (if any) and your function within this company;
- VAT number;
- User preferences;
- Your marketing preferences;
- Service requests and orders placed;
- Shopping cart and payment information;
- Newsletter subscriptions, enrolment for promotions, use of special offers, etc.
- Survey answers, reviews, ratings and other types of feedback provided;
- Content of any communication sent through the website, including any information posted in social communities on the website or otherwise shared with ITW Construction Products and/or other users;
- Any other information that you enter on, or upload to, the website (e.g., content that you fill into an online form, a photo that you upload).

Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include:

- IP address, operating system, browser type, browser version, browser configuration, name of internet service provider, and other types of computer and connection related information relevant to identifying your type of device, connecting to the website, enabling data exchange with you and your device, and ensuring a convenient use of the website;
- URL and IP address of the website from which you accessed, or were directed to, our website, including date and time;
- Subpages visited while on our website, links followed on the website, including date and time;
- The full Uniform Resource Locator (URL) click stream to, through and from the website, including date and time;
- Shopping history, including open and completed transactions;
- Search terms entered; and
- Services/products viewed or searched for on the website.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content or products on our Website are of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technologies, as explained further under the heading “Cookies and similar tracking technology” below (Chapter 8).

Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (newsletters/marketing campaigns/Surveys...), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

2. The legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where the processing is in our legitimate interests and not overridden by your rights, (ii) where we need the personal information to perform a contract with you, or (iii) where we have your consent to do so.

We will process your personal information for any of the purposes below:

- Administering, operating, maintaining and improving the website;
- Contacting you to inform your organisation of new products and services we will be Providing;
- Evaluating your organisation's eligibility for certain types of offers, products or services;
- Helping us to improve and personalise the website, our marketing, products and services;
- Performing analytics and conducting customer research, including general market research or surveying our customers' needs and opinions on specific issues, generating sales and traffic patterns, and to analyse advertising effectiveness, both on an anonymous basis (e.g., by aggregating data) or on an individual basis (if legally permissible);
- Answering your questions and responding to your requests (via webforms for example);
- Providing your organisation with information about our other products and services and regular updates on issues that may be of interest to your organisation performed through marketing channels such as (but not limited to): traditional mail, email, telephone, fax, newsletter, text / SMS / MMS messaging, social media posts, online advertising and search engine advertising, including periodic sending of promotional materials on products, services and promotions of ITW Construction Products specifically dedicated to your organisation (direct marketing);
- Creating statistical data about use of our Website and Social Media Pages, products and services;

- Confirming that your organisations' orders have been received and to process them, to validate your organisation as a registered customer when using our services and calling our customer services;
- Providing the relevant products and services to your organisation, for administration of your organisation's account with us and customer services, and for billing purposes;
- Our internal purposes such as management, research, analytics, corporate reporting and to improve business efficiencies;
- Ensuring security for your organisation and our staff, and help maintain service quality (calls to our customer services may be monitored and/or recorded for authentication, security, quality and training purposes);
- Tracing nuisance or malicious calls;
- Complying with applicable laws, regulations, court orders, government and law enforcement agencies' requests, to operate our systems properly and to protect ourselves, our users and customers and to solve any customer disputes;
- Segmenting our customer base and help us develop offers, products and services to provide your organisation with the best customer experience (collecting data through our CRM system);
- Communicating with you on other matters (e.g., to send you service reminders, technical notices, updates, security alerts, support and administrative messages or service bulletins);
- Administering rewards, surveys, sweepstakes, contests, or other promotional activities or events;
- Complying with legal obligations, prevent unlawful uses of the website, resolve disputes, and enforce our agreements; and
- Other purposes that you have specifically agreed to; and otherwise as permitted by applicable law.

We will seek your consent before collecting, processing and using your personal information for the above-mentioned purposes, if and to the extent legally required. Likewise, if we wish to use your personal information for a new or different purpose that is not compatible with the purpose for which we collected or received it, we will notify you and will only make such other use if it is required or permitted by applicable law or if you have consented to it.

For the purposes mentioned above, only a limited number of individuals within ITW Construction Products company (e.g. individuals in sales, support, legal, finance, IT and accounting departments, as well as certain managers with assigned responsibility) will receive access to your personal information.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" in chapter 11 below.

3. Who do we share your personal information with and how

For the purposes mentioned above, we may share your personal information with third parties. In order to make improvements to our website we may gather information that helps us understand how customers use it. For example, we may research the collected information to determine which areas of the site our customers most frequently access. ITW Construction Products may provide aggregate statistics about our customers, sales, traffic patterns, and related site information to reputable third-party vendors, but these statistics will not include individual identifying information. Personal information such as your name and email address will not be used in our research.

We do not sell, trade, rent, disclose, transfer or otherwise share your personal information, except as follows:

- **Our group companies, third party service providers and partners:** We may employ third party service providers (i.e., companies or individuals engaged by us) to perform certain functions on our behalf and under our instructions. Examples include database management, maintenance services, web analytics, handling in-bound inquiries, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing sales and marketing assistance, processing credit card payments, and providing customer service. Third party service providers may for instance include IT companies, credit card processors, credit rating agencies or legal, financial and other advisors. Any third-party provider who provides data processing services to us, or who otherwise processes personal information for purposes that are described in this Privacy Notice will have access only to such personal information as it needs to perform its specific functions, and only for the purpose of performing these functions. We will ensure that any third-party service provider is aware of and abides by these obligations. We will also ensure that any third-party service provider processes your personal information as required by applicable data protection laws and that they adopt adequate technical and organizational security measures. A list of our current group companies is available here: www.paslude.com and below is a list of our current service providers and partners:
 - 3C evolution
 - Epicor
 - Maximizer
 - Charisma
 - Survey monkey
 - Mailchimp
- **Courts, competent law enforcement authorities and regulatory, government agency:** We may share personal information when we believe it necessary to comply with applicable law or regulation, to exercise, establish or protect our legal rights, or to protect your vital interests, the rights or safety of our website, other users, or third parties (e.g., for fraud protection purposes). Without limitation, this may include cases in which we are required to share personal information by the law or binding order of courts, law enforcement authorities or regulators.
- **Potential or actual buyers** (and its or their agents and advisers): As we continue to develop our business, we might sell all or parts of our website or business. We may

disclose your personal information to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business or website, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice.

- **Any other person:** if agreed by you (e.g., where you consent to other types of data transfers in connection with enrolling for a specific service).

4. Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible in accordance with our standard backup deletion/destruction policies.

5. Your data protection rights for personal information held by ITW Construction Products

You have the following data protection rights:

- If you wish **to access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below, chapter 11. Upon receipt of your written request and enough information to permit us to identify your personal information, we will disclose to you the personal information we hold about you and to which you are entitled, for which we may make a charge up to the maximum as allowed by applicable law. You may request that we rectify any personal information that is inaccurate or delete any personal information that you think we no longer have a legitimate purpose for processing, as may be required by law. Requests to delete personal information are subject to any applicable legal and ethical reporting or document retention obligations imposed on us.
- In addition, you can **object to the processing** of your personal information in certain situations, including where your personal information is processed on the basis of legitimate interests.
- You can also ask us, in certain situations, to **restrict processing** of your personal information (i.e. stop processing but retain the information), or to **provide portability** of your personal information (i.e. transfer your personal information to you or another party as you request). Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below, chapter 11.

- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below, chapter 11.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority, which in the UK is the ICO (www.ico.org.uk). We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

6. Will my personal information be transferred abroad?

Our group companies and third-party service providers and partners operate around the world. Accordingly, your personal information may be transferred to, or processed in, in any country other than the country in which you are resident. This may include countries where applicable data protection laws provide a lesser degree of protection than your home country. Specifically, our Website servers are located in France, this means that when we collect your personal information we may process it in any of these countries.

For instance, if you are located within the EU/EEA or Switzerland, the country where the recipient is located may not qualify as a safe country within the European Data Protection Directive (95/46/EC), the EU General Data Protection Regulation (679/2016) or the Federal Data Protection Act of Switzerland. In such cases, ITW CONSTRUCTION PRODUCTS will nevertheless ensure an adequate level of protection for your personal information in compliance with applicable data protection laws. This includes ensuring that the recipient abides by the principles of the Privacy Shield (for recipients in the US). It also includes implementing the European Commission’s Standard Contractual Clauses for transfers of personal information between our group companies; these require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law.

Our Standard Contractual Clauses can be provided on request. [We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.]

7. Security measures for your personal information

We are committed to protecting the confidentiality and security of the information that you provide to us and we put in place appropriate technical, physical and organisational security measures to protect against any unauthorised access or damage to, or disclosure or loss of, the personal

information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

You should also be aware that communications over the internet, such as e-mails, are not secure unless they have been encrypted.

8. Cookies and Similar Technologies

Cookie Notice

ITW Construction Products respects your personal privacy and is committed to adhering to the applicable privacy and data protection laws and industry guidelines, including GDPR.

This cookie notice ("Cookie Notice") and our Website Privacy Notice describe how we handle the personal information that you provide to us on the websites www.itwcp.com, www.itwcp.co.uk and www.itwcp-offsite.co.uk. This notice applies only to the ITW Construction Products website portfolio (including but are not limited to www.itwcp.com, www.itwcp.co.uk and www.itwcp-offsite.co.uk (and all sub-sites)) and not to any third-party sites that may be accessible from here.

We use cookies, web beacons, unique identifiers and similar technologies to collect and store information (which may include your personal information) about how you interact with our websites, communications and services and selected third party websites which belong to our partner advertising networks. We may use these technologies to show you relevant adverts based upon this information, this is called interest-based advertising.

Cookies are small text files placed on your device which uniquely identify your device. Cookies cannot be used to run programs or deliver viruses to your device.

Web beacons (also known as "Pixel tags") are small blocks of code on webpages or in our emails that allow us to read and set cookies. Web beacons are often used in connection with cookies to help operate our websites, emails and collect information about online activity.

Cookies

To make this website simpler to use and navigate, we sometimes place a small data file on your computer or device. These are known as cookies. Most websites you visit will use cookies in order to improve your user experience by enabling that website to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie').

Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and generally improving your experience of a website. Cookies make the interaction between you and the website faster and easier. If a website doesn't use cookies, it will think you are a new visitor every time you move to a new page on the site – for example, when you enter your login details and move to another page it won't recognise you and it won't be able to keep you logged in.

They make your visit simpler by:

Remembering settings, so you don't have to re-enter them at every page you visit (such as placing items in an ecommerce shopping basket)

Remembering information you've given (such as a Postcode) so you don't need to keep re-entering it

Measuring how you use our website so we can improve it to meet your needs

We use cookies to make the site work better for you and because they are essential to the usage of our website. You can manage and/or delete these small files as you wish. Learn more about cookies and how to manage them at AboutCookies.org.

If you prevent cookie usage on this website then please note that some parts may then be inaccessible or not function properly.

If you do not want any information collected, then you should choose not to use the ITW Construction Products web site.

How we use cookies

Our website may use cookies in several places - we've listed each of them below with more details about why we use them.

Measuring Website Usage (Google Analytics)

We use Google Analytics to collect information about how people use this site. We do this to make sure it is meeting its users' needs and to understand how we could do it better.

Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on.

The following cookies are set by Google Analytics:

Name	Content	Expires
_utma	randomly generated number	2 years
_utmb	randomly generated number	30 minutes
_utmc	randomly generated number	When you close your browser
_utmz	randomly generated number and information on how the site was reached (e.g. direct or via a link, organic search or paid search)	6 months
_utmx	randomly generated number	2 years
_utmxx	randomly generated number	2 years

Shopping Basket

For our websites that contain ecommerce areas, we set a simple cookie that has:

Name	Content	Expires
website domain name (ie, smith.com)	randomly generated alpha-numeric code (shopping basket id eg Nc87HDteg3)	60 days OR directly on completion of purchase

Members and Registered Users

For our websites that contain members areas and have registered users, we set a simple cookie that has:

Name	Content	Expires	
	website domain name (ie, smith.com)	id number of membership (eg '42')	At midnight of the same day
	not all websites	your country (by name eg 'UK')	At midnight of the same day
	not all websites	VAT exemption status (simple 'Yes' or 'No')	At midnight of the same day

'Remember Me' Function

For our websites that contain members areas and have registered users, and allow you to be 'remembered' for your next visit, we set a simple cookie that has:

Name	Content	Expires	
	website domain name (ie, smith.com)	id number of membership (eg '42')	30 Days

Changes to the Notice

ITW Construction Products reserves the right to update or modify this Cookie Notice, at any time and without prior notice, by posting the revised version of this Cookie Notice on our ITW Construction Products Website. If we modify this Privacy Notice, the modifications will only apply to personal information we collect after we have posted the revised Cookie Notice on the Website.

9. Links to third party websites

This privacy notice does not apply to third party websites which our websites link to or which advertise on our websites. These third-party websites operate their own privacy notice or policy which we encourage you to read.

10. Changes to our Privacy Notice

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with changing legal, technical or business requirements. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

11. How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following details:

Address: ITW Construction Products, 1 Wheatstone Place, Southfield Industrial Estate,
Glenrothes, Fife, KY6 2SW, UK

Contact Number: 01592 771132

E-mail: Marketing@itwcp.com

The data controller of your personal information is Peter Archer (PArcher@itwcp.com)

Compliance and Cooperation with Regulatory Authorities

We review our privacy notice on a regular basis. Our procedures and practices are in line with the GDPR set by the EU, which will remain the case after the UK has left the EU.