

PRIVACY NOTICE

About this Document

At Alpek Polyester UK Ltd (**"APUK"**), we are committed to protecting your personal data. This privacy notice explains how we handle the personal data which we gather in relation to:

- Your or your employer's dealings with us; or
- Your use of our website www.alpekpolyester.com

It also explains your privacy rights and how the law protects you including how we comply with the General Data Protection Regulation ("**GDPR**") and other related legislation including the Data Protection Act 2018.

It is important that you read this privacy notice together with any other statements or fair processing notices we may provide on specific occasions when we collect or process personal data so that you are fully aware of how and why we are using your data.

Data Controller

Alpek Polyester UK Ltd is a data controller for the purposes of relevant data protection legislation and is responsible for the use of your personal data. Our full details are set out below.

Contacting Us

If you have any questions about this privacy notice including any requests to exercise your data privacy rights, please contact:

Jackie Petford, HR Manager, Alpek Polyester UK Ltd, Davies Offices, Wilton International, Redcar, Cleveland, TS10 4XZ

Email: Jackie.Petford@alpekpolyester.com **Tel:** 01642 451147

You have the right to make a complaint to the Information Commissioner's Office (**ICO**) which is the UK supervisory authority for data protection issues (www.ico.org.uk) if you have a complaint about our use of your personal data. We would, however, like the opportunity to assist you with any concerns before you approach the ICO so please contact us in the first instance using the details above.

Your obligations

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.

If you provide us with information about any other person, for example any other individuals within your organisation or your business partners, then you must ensure that you have their consent to pass those details to us and for us to use those details in accordance with this privacy notice. You should also make sure that you bring this privacy notice their attention.

Where we need to collect personal data by law, under the terms of a contract we have with the organisation you represent or for another lawful reason and you fail to provide that data, we may not be able to fully perform our obligations in accordance with our contract, provide you with the information you require or otherwise properly deal with your request.

Data we collect about you

Personal data means any information about an individual from which that person can be identified. It does not include data which has been anonymised such that a person's identity is removed.

In connection with our dealings with you or your employer we will gather the following information from/about you:

- Identity and Contact Data such as names, titles and other identifiers (in some cases photographs) together with business address, email address and telephone numbers. We may also collect (through our Careers page) information in connection with job applications (e.g information that you include on a CV).
- Technical Data including internet protocol (IP) address, browser type and version, browser plug-in types and versions, operating system and platform and other technical based information in relation to devices you use to access our website. This may also include information about how you use our website.
- Details of transactions you, or your employer has made with us through our website, in writing or over the telephone.
- Details of other dealings we have with you.

How do we collect your data?

We collect data from you from the following sources:

- Information you provide to us via direct interactions;
- Information you provide to us including via our website, telephone or in writing;
- Information we generate through our observation of interactions with you;
- Information your employer or others provide to us about you (for example for the purpose of performing a contract).

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 it.

Where service providers are holding personal data on our behalf, we will carry out due diligence on them and make sure we have a contract with them which satisfies the requirements of data protection legislation.

How and why we will use your data?

We will usually only process your personal data where you have given your consent or where the processing is necessary:

- To comply with our legal obligations;
- At your request to consider entering into a contract with you;
- For the purpose of a contract with you; or
- To pursue our legitimate interests (or those of a third party in operating our business effectively).

We use data we collect about you to help us make more informed decisions about you and our relationship/potential relationship with you to help us to operate our business efficiently. This may involve (but not limited to) the following activities:

- Carrying out our obligations arising from any contracts entered into between you or the organisation you work for and us;
- To provide you with information that you request from us or which we may feel may interest you, where you have consented to be contacted for such purposes;
- To assess your suitability of the organisation you work for, to provide services to us;
- To manage and improve the content of our site so that it is presented in the most effective manner;
- To manage our CSR relationships (and company publications such as newsletters etc) for PR purposes;
- Notifying you about changes to our business;
- Contacting you with regard to general dealings between us.

Who will access to your data?

Our company personnel (employees, contractors, agents, consultants and third parties) who need access will view it in order to fulfil our relationship with you. All employees are aware of their obligations with regard to data protection and understand the need to keep your information confidential.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please also note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your data outside of the European Economic Area (EEA)

We will not transfer your personal data outside the EEA unless such transfer is compliant with the law. This means that we cannot transfer any of your personal data outside the EEA unless:

- The EU Commission has decided that another country or international organisation ensures an adequate level of protection of your personal data
- The transfer of your personal data is subject to appropriate safeguards which may include binding corporate rules or standard data protection clauses adopted by the EU Commission; or
- We are otherwise permitted to do so by law (including if you explicitly consent to the proposed transfer).

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting and reporting requirements. This means that data will be destroyed or erased from our systems when it is no longer required. For guidance on how long certain data is likely to be kept; please contact our Data Protection Representative.

IP addresses and cookies

We may collect information about your computer, including your IP address, operating system and browser type. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

Our site uses cookies. A cookie is a small file of letters and numbers that we put on your computer. These allows us to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site, to improve our site and to deliver a better service, for example ensuring that users are finding what they are looking for easily.

There are different categories of cookies. We use Google Analytics which are "analytical" type cookies. We use them to enable us:

- To recognise and count the number of visitors and to see how visitors move around our site and when they are using it
- To store information about your preferences and so allow us to customise our site according to your individual interests
- To speed up your searches
- To recognise you when you return to our site

You may refuse to accept (or in other words, delete) cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. For more information on disabling cookies and more information on cookies generally see <http://www.allaboutcookies.org/>.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Those rights are listed below. Please contact us if you would like to exercise any of them. You have the right to:

- **Request access** to your personal data (a “data subject access request”). This means you can receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your personal data: 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.
- **Request erasure of your personal data.** You can ask us to remove personal data where there is no good reason for us continuing to process it. You also have this right where you have successfully exercised your right to object to processing, where we may have processed your data unlawfully or where we are required to erase your personal data to comply with law. We may not always be able to comply with your request where there are particular legal reasons.
- **Object to processing** of your personal data where we rely on a legitimate interest basis and if the processing impacts on your fundamental rights and freedoms. You can also object to direct marketing. In some cases, we may demonstrate that we have grounds to process your data which override your rights and freedoms.
- **Request restriction of processing.** You can ask us to suspend the processing of your personal data: if you want us to establish the data’s accuracy; where our data use is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer need it, to establish, exercise or defend legal claims; or you have objected to use of data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request a data transfer.** We will provide to you, or your chosen third party, your personal data in a structured, commonly used, machine-readable format. This only applies to automated information which you provided consent for us to use or necessary to perform a contract with you.
- **Withdraw consent at any time** where we rely on consent to process your personal data. This will not affect the lawfulness of processing carried out before you withdraw your consent.

Exercising your rights

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

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 personal data is not disclosed to a person who has no right to receive it. We may also contact you to ask you to clarify your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests in which case we will keep you updated.