

PRIVACY NOTICE

KIP UK Limited (**we, us or our**) respects your privacy and is committed to protecting your personal data. This privacy notice will provide you with information about 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 notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website, when you contact us, when you purchase our products and services, or where we are providing you with a product or service.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 personal data. This privacy notice supplements those other notices and is not intended to override them.

For the purpose of data protection laws in the UK, KIP UK Limited is the data controller and is therefore responsible for your personal data.

If you have any questions, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out at the bottom of this privacy notice.

1. The personal data we collect

Personal data means any information about an individual from which that person can be identified. 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, marital status, title, date of birth and gender.
- **Contact Data** includes address (home, postal or other physical address), email address, fax 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 services you have purchased from us.
- **Profile Data** includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **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 our website.
- **Usage Data** includes information about how you use our website, products and services.

Personal data does not include data where your identity has been removed or which not associated with or linked to your personal data (anonymous data).

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not

considered personal data in law as this data does **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 notice.

Please note that 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 products or services that you request). In this case, we may have to cancel a service you have requested but we will notify you if this is the case at the time.

2. How we collect personal data

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, by corresponding with us by post, phone, email, via our website or otherwise, or when you enter into a contract with us for the provision of our goods or services.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as Contact, Financial and Transaction Data from credit reference agencies such as Graydon UK Limited in the UK and Dun & Bradstreet both in the EU and United States.

3. The purposes for which we use personal data

We will only use your personal data when the law allows us to. We may collect and process the personal data about you for the following purposes:

- **Ordering our products and services** - we will use your Identity, Contact, Financial and Transaction Data in order to register you as a customer and to process and deliver products and services to you, including the management of payments, fees and charges. This is necessary for the purpose of performing our contract with you.
- **Contacting us** - when you contact us with an enquiry or to request information (including brochures and other hard copy materials), we will use your Identity and Contact Data to respond to you.
- **Advertising, marketing and public relations** - we may use the Identity, Contact, Technical, and/or Usage Data of our customers to form a view on what we think our customers may want or need, or what may be of interest to them and in doing so we will only send information that is deemed relevant to their use of our services. This is necessary for our legitimate interests in growing and developing our business including our products and services. Customers will receive marketing communications from us if they have requested information from us or purchased services from us and, in each case, have not opted out of receiving that marketing. We will however ask for express consent before we share personal data with any third party for marketing purposes. You can ask us to stop sending marketing communications at any time by contacting us.

- **Surveys** – If you choose to complete a survey that we use for research purposes we will retain the information that you provide in response to that survey. This is necessary for our legitimate interest in understanding our customers and developing our business and to informing our marketing strategy.
- **Administration** - we may use your Identity, Contact and Technical Data for the purpose of protecting our business and our website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data. This is necessary for our legitimate interest in for running our business, the provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, and for compliance with our legal obligations.
- **Website Analytics** - as you navigate our website, Technical and Usage Data may be collected automatically. We do this to find out things such as the number of visitors to the various parts of the website, and to help us to improve the content of the website and to customise the content or layout of the website for you, in accordance with our legitimate interests. This is necessary for our legitimate interest in defining 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.
- **Fault reporting** - if you contact us to report a fault with our website, we will use the Identity and Contact Data provided for the purposes of rectifying that fault in accordance with our legitimate interests.
- **Recruitment** - personal data provided for an employment opportunity will be processed so as to allow us to process and evaluate the merits of that application in accordance with our legitimate interests.
- **Registering for events** – personal data provided for the purpose of registering to attend events listed on our website will be used to process the booking. This is necessary for our legitimate interest in managing the booking and enabling you to attend the event.

We may also use personal data which you provide to us, where the law allows us to do so, as follows:

- To deal with and/or respond to any enquiry or request made by you prior to entering into any contract or agreement with us or as a result of such contract or agreement.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation, including the prevention of crime.
- 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.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to 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 on the details set out below.

Where we process personal data on the basis of a legitimate interest, as set out in this privacy notice, legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service 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.

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. 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 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. This may include removing you from our marketing database where there has been no interaction between us over a prolonged period.

4. Disclosure of personal data to third parties

Your personal data may be shared with our group companies including KIP America, Inc, Katsuragawa Electric Co., Ltd and our European Group Companies.

Your personal data will only be disclosed to those of our employees or workers that have a need for such access for the purpose for which it was collected. Your personal data will not be disclosed to any other individuals or other entities except in the following circumstances:

- On occasion, we need to engage other companies to help us to serve you better and in some of these cases we may need to share personal data that is necessary to perform tasks for us, including credit reference agencies such as Graydon UK Limited, and Dun & Bradstreet, software providers such as the Oracle Corporation (NetSuite) and providers of banking support functions such as Lloyds Bank Plc.
- Where it is necessary for the performance of our contract with you, including where you have asked us to do so or where we need to take steps to enforce any contract which may be entered into between us.
- Where we are under a legal duty to do so in order to comply with any legal obligation.
- In order to protect the rights, property or safety of our business, our employees and workers, customers, suppliers and others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.
- If we or substantially all of our assets are acquired by a third party, in which case personal data that we hold about our customers will be one of the transferred assets.

We require all third parties that process personal data on our behalf 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.

5. Security

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal data we collect. In addition, the access to and use of the personal data that we collect is restricted to our employees who need the personal data to perform a specific job role or activity. Where personal data is shared with third parties in line with this privacy notice responsible measures are used to protect your personal data.

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.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access. We urge you to take every precaution to protect your personal data when you are on the internet.

6. International transfers

We share your personal data within the KIP Group including to KIP America, Inc, and Katsuragawa Electric Co., Ltd. This will involve transferring your data outside the European Economic Area (**EEA**).

The personal information that we collect from you may be processed by staff operating outside the EEA who work for us, for a group company or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of our contracts and/or agreements with you, the processing of any payments and the provision of support services. Whenever we transfer your personal data outside of the EEA we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and that it is subject to at least one of the following safeguards.

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers or transfer your data to other group companies, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

You can obtain further information about the specific safeguards in place for the transfer of your personal data outside the EEA in a particular situation or more generally by contacting us.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your information we will use strict procedures and security features to try and prevent unauthorised access.

7. 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, or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal data are available in our data retention policy which you can request from us by contacting us.

In some circumstances we may 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.

8. Your rights

You have the right to:

- **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 that we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.
- **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 personal data unlawfully or where we are required to erase your personal data to comply with local law. Please 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.
- **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 personal data which override your rights and freedoms.
- **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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **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.
- **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. You can ask us to stop sending you marketing

messages at any time by following the “unsubscribe” (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.

If you wish to exercise any of your above rights, please send a written request to us at the address listed at the end of this privacy notice.

You will not have to pay a fee to access your personal data or to exercise any of your 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 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.

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 a number of requests. In this case, we will notify you and keep you updated.

9. Other websites and links

Our website may contain links to other 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 third party websites and are not responsible for their privacy notices or for the content, accuracy or opinions expressed in such websites. We do not investigate, monitor or check third party websites for accuracy or completeness and the inclusion of any linked website on or through our website does not imply approval or endorsement by us of the linked website.

If you decide to leave this website and access these third party websites, plug-ins and/or applications you do so at your own risk. We encourage you to read the privacy notice of every website you visit.

10. Changes to this privacy notice

This version was last updated on 31 May 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.

11. Contact Details

Our full contact details are:

KIP UK Limited
Magellan House
Lampton Drive
Everdon Park
Heartlands Business Park
Daventry NN11 8YH

Phone: +44 (0) 1327 304600
Fax: +44 (0) 1327 871097

Email: info@kipuk.com

12. Complaints

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.