



DATA PRIVACY POLICY

Data Protection Act 1998 (DPA) EU General Data Protection Regulation 2018 GDPR
KIRINTEC is a registered company with the Information Commissioners Office

1. Policy Objective

To collect and use personal information fairly and transparently by providing access to personal data retained and provide greater choice and control over how it is used, you agree that we may collect, store and use it (a) in order to perform our contractual obligations to you, (b) based on our legitimate interest for processing (i.e. for internal administrative purposes or for the detection or prevention of crime) or (c) based on your consent, which you may withdraw at any time.

2. What personal data is collected, how its retained and how its processed:

KIRINTEC Ltd are responsible for data collection, manual processing, and the protection of personal information and will make information available to its data subjects (the individuals whom the data relates to) on request, so far as practicable or when legally obliged to do so.

3. What personal information is being collected:

KIRINTEC Ltd will collect and retain the following information:

- Company name
- Contact names
- Contact address
- Telephone number
- Contact email address
- Project related information to provide products or services
- The industry sector

4. Request for Consent:

The European Union General Data Regulation (GDPR), regulated by the Information Commissioners Office sets a high standard for consent. Consent means offering people genuine choice and control over how organisations use data. Consent requires a positive opt-in and not any other method of consent by default.

KIRINTEC Ltd wants to keep its clients/customers informed of products and services. To do that KIRINTEC Ltd needs to ask for your consent to process your contact information to communicate with you through both normal communication and marketing means.

If following consent KIRINTEC Ltd do not contact you are promoting its products or services for a period greater than twenty four months your consent will need to be re-sought.

You have the right to request KIRINTEC Ltd to remove your personal data by withdrawing consent. You can withdraw consent in part or in full.



5. Who collects the personal information:

On the permission of the subject all employees of KIRINTEC Ltd collect information detailed above as and when required.

6. How Kirintec collect information:

To the extent permissible under applicable law, Kirintec collect information about you and any other party whose details you provide to us when you:

- Place an enquiry on our website, or contact Kirintec regarding our products and services; this may include your name (including business name), address, contact (including telephone number and email address) and payment details;
- Complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, download information on our website or within our service;
- Interact with us using social media
- Provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details;
- Contact us offline, for example by telephone, SMS, Fax, Email or post

Kirintec will also collect your information where you partially complete and/or abandon any information entered into our website and/or other online forms. Kirintec may use this information to contact you to remind you to complete any outstanding details.

Kirintec also collect information from your devices (including mobile devices) and applications you or your users use to access and use any of our websites, applications or services (for example we may collect the device identification number and type, location information and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log information) and we will ask for our permission before we do so.

If you intend giving Kirintec personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws. In so far as required by applicable data protection laws, you must ensure that beforehand you have their explicit consent to do so and that you explain to them how Kirintec collect, use, disclose and retain their personal information or direct them to read our Privacy Policy.

7. How Kirintec use your information

To the extent permissible under applicable law, Kirintec use your information to:

- Provide any information and services that you have requested
- Compare information for accuracy
- Provide, maintain, protect and improve any products, services and information that you have requested from us;
- Manage and administer your use of services you have asked Kirintec to provide;
- Manage our relationship with you



- Monitor, measure, improve and protect our content, website, applications and services to provide an enhanced user experience for you
- Provide you with information that Kirintec are required to send you to comply with our regulatory or legal obligations;
- Detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes)
- Contact you to see if you would like to take part in any customer research Kirintec may undertake for example (feedback on your use of our products and services)
- To monitor, carry out statistical, analysis and benchmarking, provided that in such circumstances it is on aggregated basis which will not be linked back to you
- Deliver targeted advertising, marketing (including in-product messaging), or information to you which may be useful to you, based on your use of our products and services
- Check specific information from your device or systems directly relevant to your use of the websites, applications or services against our records to make sure the websites, applications or services are being used in accordance with our agreements and to troubleshoot problems
- Obtain information relating to any technical errors or other issues with our website, applications and services
- Collect information about how you use the functions of the features of our website, applications and services
- Gather statistical information about the operating system and environment from which you access our applications or services

Kirintec may monitor and record our communications with you, including e-mails and phone conversations. Information which Kirintec collects may then be used for training purposes, quality assurance, to record details about our website, applications and services you engage with us, ask us about, and in order to meet legal and regulatory obligations.

8. Your information and your rights:

To view your personal information retained by KIRINTEC Ltd, you should contact us and the information will be provided within one month of the request.

You are entitled to request any personal contact information be rectified if it is inaccurate or incomplete. Any request must be written and addressed to the Deputy Managing Director KIRINTEC Ltd and a response will be provided within one month of receipt as long as the request is clear in the information being sought. Should further clarification be necessary this will be sought from you and once Kirintec has a clear request the one-month limit will commence.

The right to erasure does not provide an absolute 'right to be forgotten'. You have a right to have personal data erased to prevent it being processed when you withdraw consent. You can withdraw consent in part or in full. To make a request to withdraw consent please contact the Managing Director KIRINTEC Ltd.

9. Who will your personal data be shared with:

KIRINTEC Ltd will not share or impart any personal information to any third party for processing or profiling or for any other use unless we have your consent or are legally obliged to do so.



10. How is my personal information protected:

Kirintec will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. Kirintec will do its best to protect your personal information, but cannot guarantee the security of your information which is transmitted to our website, applications or services or to other website, applications and services via an internet or similar connection.

11. How long will my personal information be retained:

Information is held for the duration of a business solvency until it ceases to trade, or a request is made to withdraw consent in part or in full.

KIRINTEC Ltd reserves the right to terminate any agreement to support if any request of change or amendment to information limits, impairs or prevents its ability to provide an appropriate

And adequate standard of service using our existing systems and procedures going forward.

12. Changes to our privacy policy

Kirintec may change our Privacy Policy from time to time. However, Kirintec will not reduce your rights under the Privacy Policy. Kirintec will always update this Privacy Policy on our website showing the current effective date

13. CCTV at KIRINTEC Ltd at Walter Scott House, Ross on Wye, Old Gloucester Road HR9 5PB

CCTV footage is recorded for building security. Senior Management or delegated staff members are the only people who has access to the CCTV footage detailed above. No other person will be granted access to any footage except lawful representation in the case of a breach of security to assist in identifying a perpetrator.

The Information Commissioners Office regulates the use of CCTV footage because it involves the processing of personal information capturing and/or recording images of identifiable individuals. Because CCTV is covered by the Data Protection Act and GDPR, you have the right to see information held about you, including CCTV images which give away information about you (such as your car number plate) if necessary some areas will be blocked out to secure the privacy of other individuals that may be seen. A Subject Access Request will be required for consideration to view any footage and if authorised will be supplied on a DVD unencrypted and will therefore be required to be signed for and collected in person.

The Deputy Managing Director at KIRINTEC Ltd is responsible for CCTV footage, deciding what is recorded, how images should be used and who they should be disclosed to.

14. Statement of Transparency and fairness:

KIRINTEC Ltd regard the personal information collected when manually processed with a business purpose or purchasing history to be fair to retain and necessary for the specific action or business of marketing and promoting its product and services. The information is protected, it's not shared with any third parties, its not used for any form or automated processing or decision making and is used in a way that people would reasonable expect. Its assumed that collecting and retaining this basic information will cause no justified adverse effect on businesses or individuals concerned and is therefore not likely to cause objection or complaint. In the event it does, please contact the Managing Director who will exercise your right to withdraw consent. In circumstances you deem appropriate, you can exercise

your right to lodge a complaint with the appropriate supervisory body Information Commissioners Office.



2nd May 2018