

GRAHAM HOLMES ASTRASEAL LTD PRIVACY NOTICE

1. Introduction

The 'Company' herein includes:-

Graham Holmes Astraseal Ltd [Company Registered in England, Number 2593809]

Our registered address is Astraseal House, Paterson Road, Finedon Road Industrial Estate, Wellingborough, Northants NN8 4EX

As is true of most companies, Graham Holmes Astraseal Ltd. needs to collect and use your personal information for various purposes. We understand that you care about your privacy, and we take that very seriously. This Privacy Notice describes Graham Holmes Astraseal Ltd's policies and practices regarding its collection and use of your personal data.

2. Data Protection Officer/Data Contacts

Graham Holmes Astraseal Ltd. is not required to appoint an internal Data Protection Officer, but we have appointed Data Contacts for you to get in touch with if you have any questions or concerns about our personal data policies or practices.

Colin Stanley (Operations Director) is the Company's Data Contact. Tel: 01933 27233
E-mail: colinstanley@astraseal.com)

If you have any query, or if you wish to make a Data Subject Access Request (i.e. to make a formal request to inform you what Data we hold on you, please contact Colin. If you need to notify us of a Data Breach, please e-mail and/or call Colin.

3. How we collect and use (process) your personal information

As with other companies, we collect personal data through various channels including, but not limited to, the following channels:

- Social media communications
- Search engine marketing (SEO/PPC/affiliates)
- Offline marketing campaigns
- Business cards
- Face to face meetings (during the conducting of business)
- We may in the future use email marketing campaigns and communications (to individuals who have already consented to receive them)

Mostly, the personal data we collect is limited to the kinds of information that can be found on a business card: first name, last name, job title, employer name, work address, work email, and work phone number. In some instances, but only when appropriate, we may ask you for other

specific personal data, although this will always be optional (for example, dietary requirements in advance of an event, or your hobbies and interests).

We will store your details on Window Designer and Opera, which are Graham Holmes Astraseal Ltd's CRM database and accounts systems respectively, in accordance with our marketing data storage and retention policy (see section 8).

We will use various methods to record your consent, which may in the future include the use of a 'consent preference centre' available via buttons on pages of our websites. This would enable you to record your consent for us to send you marketing content, based on optional preferences that you control.

How we use your personal information:

If you consent, we will send you free of charge marketing content which relates to any preferences which you may have stated, until you tell us not to. You can change your preferences or remove your consent at any time by e-mailing, telephoning or writing to us. In the future, we hope to offer you the opportunity to do any or all of this by using a 'consent preference centre'.

Events, news, insights and product and services information:

From time to time, Graham Holmes Astraseal Ltd hosts events. These include in-person conferences, meetings or sessions we arrange during industry events. We also publish news, insights and information on our services. If you have given your consent to receive information about events, news, insights or our services, we will send you information in line with your stated preferences, free of charge, until you tell us not to.

We may also include forms on our website which enable you to sign up for specific events if you wish to, or download content such as insights or information about our services. Any data we collect from these specific forms will only be processed and used for purposes relating to the event or topic that the form relates to. Your consent to this will not be used as consent to send you any other unrelated marketing content, although we may also offer you an optional opportunity to consent for us to send you carefully selected marketing content that we think you might be interested in, free of charge, until you tell us not to.

Alternatively, you can contact us and specify which topics you would like us to send you information about, on an ongoing basis, until you tell us not to.

When you make an enquiry to us:

If you make an enquiry to us via our website, by email, or face-to-face (e.g. at an event), we may offer you an opportunity to consent to us storing your personal data for us to send you information relating to your enquiry, on an ongoing basis, until you tell us not to.

4. When and how we share information with others

Astraseal is committed to ensuring its products and workmanship conform to the very highest standards of safety, quality and professionalism. It is therefore necessary for us to register every installation with the appropriate authorities; and this will include our passing on some of your personal data (e.g. Name, Address and Details of Products/Installation) to FIRAS, FENSA and/or the British Standards Institute. The Privacy Notices of these highly respected regulatory organisations detailing how they use and protect your Data can be found on their Websites.

5. Transferring personal data from the EU

Graham Holmes Astraseal Ltd does not transfer data to countries that have not sought nor received a finding of “adequacy” from the European Union under Article 45 of the GDPR. We will only ever do so in the future: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of Graham Holmes Astraseal Ltd in a manner that does not outweigh your rights and freedoms.

6. Data subject rights

This Privacy Notice is intended to provide you with information about what personal data the Graham Holmes Astraseal Ltd collects about you and how it is used. If you have any questions, please contact one of the Data Contacts listed in Section 2.

Data subjects have the following rights (subject to the provisions of the GDPR):

- The right to be informed
 - The right of access
 - The right to rectification
 - The right to erasure
 - The right to restrict processing
 - The right to data portability
 - The right to object
 - Rights in relation to automated decision making and profiling.
- If you wish to exercise your rights as a data subject or unsubscribe from marketing consent which you have given previously, please contact one of the Data Contacts listed in Section 2.

7. Security of your information

To help protect the privacy of data and personally identifiable information which you transmit through use of this Site, we maintain physical, technical and administrative safeguards. We update and test our security technology on an on-going basis. We restrict access to your personal data to those employees who need to know that information in order to provide

benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

8. Data storage and retention

Your personal data is stored by Graham Holmes Astraseal Ltd on its servers, and on the servers of the 3rd party service providers Graham Holmes Astraseal Ltd engages, which are located within the UK. Graham Holmes Astraseal Ltd retains data for different durations depending on the purposes for data collection and use. We have listed the retention periods in this notice. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please get in touch with one of the Data Contacts listed in Section 2.

Web/E-mail/Data storage locations:

Graham Holmes Astraseal Ltd's servers/e-mails

CRM platform:

- Window Designer
- Opera

Storage and transfer:

- Outlook: EU
- Local/shared drives

Data retention review periods and storage durations:

Web / email / social media platforms:

- Periodic review; seven years retention

CRM platform:

- Window Designer : Periodic review; ten years retention
- Opera : Periodic review; ten years retention

Storage and transfer:

- Outlook: Periodic review; three years retention
- Local/shared drives: Periodic review; five years retention

9. Questions, concerns or complaints

If you have a question or wish to communicate any concern, please get in touch with one of the Data Contact listed in Section 2.

If you have a complaint, please contact one of our Directors:-

Andrew McKeown, Director (Tel: 01933 227233). E-mail: andrewmckeown@astraseal.com)

Mark McMullan, Director (Tel: 01933 227233). E-mail: markmcmullan@astraseal.com)

Richard Essam, Director (Tel: 01933 227233). E-mail: richardessam@astraseal.com)

Malcolm Naylor, Director (Tel: 01933 227233). E-mail: malcolmnaylor@astraseal.com)

Colin Stanley, Director (Tel: 01933 227233). E-mail: colinstanley@astraseal.com)

Last updated: 25.05.18