

## PRIVACY NOTICE & DATA PROTECTION POLICY

Fluid System Technologies (Scotland) Ltd (referred to as Swagelok Scotland) respect your right to privacy and are committed to protecting your information and/or data.

This notice applies to you if we process your personal data. You may be, for example, an employee or worker of ours, a prospective candidate employee or worker, an individual that works at a supplier or customer that we deal with, a delegate attending a training course or technical test, an attendee at one of our marketing events, or a user of our website.

References to we, our or us in this privacy notice are to Swagelok Scotland, Swagelok Teesside, Swagelok Ireland and Ireland Valve & Fitting as authorised sales and services centres for Swagelok trading as Fluid System Technologies (Scotland) Ltd. Details of our main trading entity is detailed below:

Fluid System Technologies (Scotland) Ltd is a limited company registered in Scotland no. 316064. Registered Office: 19 Glasgow & Edinburgh Road, Newhouse, Motherwell, ML1 5GJ.

Contact details are set out in the "Contact us" section at the end of this privacy notice.

We are committed to respecting your privacy. This notice is to explain how the information may be used, with whom it may be shared, and other important topics relating to your privacy and data protection before, during and after your association with us.

### 1. USE AND COLLECTION OF INFORMATION

#### Use and Collection of Personal Information

The following persons or entities may have access to the Personal Information that you provide to Swagelok Scotland and their respective employees. We will take reasonable care to protect data and limit access only to Swagelok employees or Swagelok Scotland employees who have a legitimate business reason to view the Personal Information. All parties who have access to your Personal Information are required to keep it confidential and may not use it for any purpose other than to provide you services within the normal business activities of Swagelok Scotland. Such normal business activities may include, for example:

- communicating with you about your account, products, services, events, surveys and promotions by Swagelok (including by sending you marketing communications);
- sending you samples, products and information;
- processing payment for products or services purchased by you;
- processing payment for products or services sold by you to Swagelok;
- providing you with access to certain areas and features of the website;
- verifying your identity to ensure security for the other purposes listed here;
- processing, evaluating and responding to your requests, inquiries and applications; and
- for purposes disclosed at the time you provide your Personal Information or otherwise with your consent.

#### Personal Information Collection

We may collect the following types of personal information about you:

- **Contact details:** information that allows us to identify and contact you directly such as your name, business email address, business telephone numbers and a business postal address.
- **Responses to surveys, competitions and promotions:** we keep records of any surveys you respond to or your entry into any competition or promotion we run.
- **Creditworthiness:** We may undertake investigations into the company creditworthiness in order to establish whether to enter into or continue a business relationship with you.
- **Details of your performance:** when working with or for us or in relation to any project or work we are engaged in for example should you be appointed as a sub-contractor.
- **Website usage:** your computer's IP address allows us to track your usage of our website. We may collect information about the pages you look at and how you use them.
- **Video imagery:** if you visit any of our premises which are covered by a CCTV system or participate in an ECITB Technical Test.
- **Details of the correspondence (including e-mail correspondence) you send and receive from us:** this includes letters and emails, SMS, MMS and other electronic communication and may in some cases include audio recording of telephone conversations – our emails are deleted after 1 year.

#### Sources of Personal Information

We will collect personal information from a number of sources. These include the following:

- **Directly from you:** when you provide information to us, contact us by phone, email or communicate with us directly in some other way, accept an invitation to an event, complete forms we provide to you, completing a recorded ECITB Technical Test, enter our competitions and promotions, make a claim, make a complaint or respond to a survey.
- **Our website:** provides us with information about how you use it and the devices that you use to connect to our website.
- **Our providers of background information:** which may include credit reference agencies, Companies House, LinkedIn and other web platforms.
- **The organisation you work for:** they may provide us with your name, position contact details and background information about you.

## 2. SHARING AND TRANSFERRING OF YOUR PERSONAL INFORMATION

We will keep your Personal Information private and will not disclose it to other parties, unless such disclosure is necessary to: (a) comply with any federal or state law, a court order or other legal process; (b) prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity; (c) enforce any of our Terms and Conditions of Use; (d) enable service providers we may have retained to perform services on our behalf; or (e) enable other Swagelok group companies performing services on our behalf. We also reserve the right to transfer Personal Information in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation). However, we may share non-Personal Information, such as aggregate user statistics, demographic data, and usage data with third parties. When sharing any Personal Information with a third party, Swagelok will require that party to use and protect your Personal Information in a manner that is consistent with this Policy.

In the event that we transfer the Personal Information collected to other countries where we do business, we will do so only for the purposes described herein. When any Personal Information is transferred, it will be protected as stated in this Policy.

## 3. CHOICE AND ACCESS

We will give notice to you regarding the types of third parties to which we disclose any Personal Information and provide choice regarding the types of Personal Information we disclose. You can choose to opt-out of having Personal Information stored in our systems at any time by sending an e-mail to [marketing@scotland.swagelok.com](mailto:marketing@scotland.swagelok.com) or by writing us at Fluid System Technologies (Scotland) Ltd., 19 Glasgow & Edinburgh Road, Newhouse, Motherwell, ML1 5GJ. Except as may be provided otherwise in this Policy, unless otherwise authorised by the individual, Swagelok will not disclose Personal Information to a third party. For sensitive Personal information, we will provide an affirmative or explicit (opt in) choice if: (i) the personal information is to be disclosed to a third party; (ii) used for a purpose other than those for which it was originally collected; or (iii) subsequently authorised by the individual through the exercise of opt in choice. You can request a copy of the Personal Information that Swagelok has collected about you at any time by sending an e-mail to [marketing@scotland.swagelok.com](mailto:marketing@scotland.swagelok.com) or by writing us at Fluid System Technologies (Scotland) Ltd., 19 Glasgow & Edinburgh Road, Newhouse, Motherwell, ML1 5GJ. You can also have factual inaccuracies in this information corrected, or request that your Personal Information be removed, by contacting us. We are under no obligation to store Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of Personal Information.

## 4. HOW WE PROTECT YOUR PERSONAL INFORMATION

### Security

Swagelok Scotland takes reasonable and appropriate precautions to protect Personal Information from loss, misuse and unauthorised access, disclosure, alteration and destruction.

### Data Integrity

Swagelok uses Personal Information only for the purposes for which it was collected or subsequently authorised by the individual. Swagelok takes reasonable steps to ensure that the Personal Information the company processes are (i) relevant for the purposes for which they are to be used, (ii) reliable for their intended use, and (iii) accurate, complete and current.

### Verification

Swagelok Scotland uses a self-assessment approach to ensure compliance including a periodic assessment to verify this policy is accurate and being adhered to as well as regular data cleanse exercises to ensure data is up-to-date and accurate. If you have concerns, please contact us and Swagelok Scotland will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information.

## 5. CHANGES TO THE PRIVACY, DATA PROTECTION AND COOKIES POLICY

This Policy may be updated periodically and without prior notice to you to reflect changes in our information practices.

## 6. HOW TO CONTACT US

If you have any questions or comments about this Policy, please contact us by:

Writing to: Fluid System Technologies (Scotland) Ltd., 19 Glasgow & Edinburgh Road, Newhouse, Motherwell, ML1 5GJ

Or via e-mail to: [marketing@scotland.swagelok.com](mailto:marketing@scotland.swagelok.com)