

Issue 3, 6th April 2021

Privacy Policy

for all your metal needs... **STAINLESS STEELS**

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CLAD & PLATED METALS

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Background:

The Knight Group understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who shares data with us and we only collect and use personal data in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

This Policy applies to our use of any and all data collected by us. Please read this Privacy Policy carefully and ensure that you understand it.

Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

- "Account" means an account required to query, quote or place an order within our systems and/or use certain areas and features of Our Sites;
- "Personal data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 - the General Data Protection Regulation ("GDPR");
- "We/Us/Our" means the Knight Group, consisting of Knight Strip Metals Ltd, a limited company registered in England under Company number 00382978 and whose registered address is Linkside Business Centre, Summit Road, Cranborne Road Potters Bar, Hertfordshire, EN6 3JL and Precision Metals EU, registered in Belgium under Company number BE 0534.825. 336 and whose registered address is Industriezone Mechelen-Noord(D), Omega Business Park, Wayenborgstraat 25, B-2800 Mechelen, Belgium.

Scope - What Does This Policy Cover?

Your Rights

1.1 We are working with you in a business capacity and you agree that as such you are not providing data which relates to you as an individual and in respect of your personal life. As such, unless you advise otherwise, we will treat you as a corporate subscriber, as defined in the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended) and consider that it is a legitimate interest to send you the marketing material.

- 1.2 Without prejudice to clause 1.1, as a data subject, you have the following rights under the GDPR, which this Notice and Our use of personal data have been designed to uphold 1.2.1 The right to be informed about our collection and use of personal data.
- 1.2.2 The right of access to the personal data we hold about you (see section 7).
- 1.2.3 The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 8).
- 1.2.4 The right to be forgotten i.e. the right to ask us to delete any personal data we hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 8).
- 1.2.5 The right to restrict (i.e. prevent) the processing of your personal data.
- 1.2.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation).
- 1.2.7 The right to object to us using your personal data for particular purposes.
- 1.2.8 Rights with respect to automated decision making and profiling.
- 1.3 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 8 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 1.4 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

How We Use Your Data

- 2.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 3, below.
- 2.2 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data or because it is in our legitimate interests. Specifically we may use your data for the following purposes: 2.2.1 Providing and managing contact via email, mail, verbal requests or other
- 2.2.2 Personalising and tailoring your experience with us verbally.
- 2.2.3 Supplying our products and/or services to you.
- 2.2.4 Personalising and tailoring our products and/or services for you.
- 2.2.6 Supplying you with emails that you can opt-out of at any time by contacting us.
- 2.2.7 Market research.
- 2.2.8 Analysing your use of our website (if you use it) and gathering feedback to enable us to continually improve your user experience.
- 2.2.9 Personal Data may be shared with a bank or finance provider.
- 2.3 Where permitted by law, we may also use your data for marketing purposes which may include contacting you by email and/or telephone and/or text message and/or post with information, news and offers on our products and/or services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under GDPR.
- 2.4 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.
- 2.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

How and Where Do We Store Your Data

3.1 We only keep your personal data for as long as we need to in order to use it as described above in section 2, and/or for as long as we have your permission to keep it.

- 3.2 We do not store your data outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). If we do store data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 3.3 Data security is very important to us and to protect your data we have taken suitable measures to safeguard and secure data collected.

Do We Share Your Data

- 4.1 We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
- 4.2 We may compile statistics about the use of our business with you including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 4.3 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

What Happens If Our Business Changes Hands

- 5.1 We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Notice, be permitted to use that data only for the same purposes for which it was originally collected by us.
- 5.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

How Can You Control Your Data

- 6.1 In addition to your rights under the GDPR, set out in section 1, we aim to give you strong controls on our use of your data.
- 6.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

How Can You Access Your Data

7. You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact us for more details at james.needs@knight-group.co.uk or using the contact details below.

Contacting Us

8. If you have any questions about this Privacy Notice, please contact us by email at james.needs@knight-group.co.uk or by post at our registered address. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.