

## GDPR PRIVACY POLICY

### 1. OUR PRIVACY POLICY

- 1.1 At Swagelok London, we value your privacy and following the new rules set by the European Union's General Data Protection Regulation (GDPR), we have updated our privacy policy as of 22nd May 2018.

### 2. INTRODUCTION

- 2.1 This privacy policy tells you how and why we collect, store and use your personal data when you visit our website and interact with us via our SwageLife Web based system.
- 2.2 It tells you about your rights in relation to your personal data and how the law protects you. Also covers is how to contact us and the authorities in the event you have a complaint.
- 2.3 We ask that you read this privacy policy carefully so that you are fully aware of how and why we are using your data. If you have any questions, or would like to exercise your privacy rights, please contact us directly at [unsubscribe@london.swagelok.com](mailto:unsubscribe@london.swagelok.com)

### 3. WHO WE ARE

- 3.1 Swagelok London are a gas and fluid systems components provider in Kings Langley, United Kingdom. In this privacy policy references to we, us and our, are to London Fluid System Technologies Limited t/a Swagelok London.
- 3.2 We collect, use and are responsible for certain personal data about you within the SwageLife Web based system. We are regulated under the General Data Protection Regulation which applies across the European Union, and we are responsible as 'controller' for the personal data for the purposes of those laws.

### 4. WHAT DATA IS COLLECTED BY US?

- 4.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed which is classified as anonymous data.
- 4.2 During your visit to and interaction with the SwageLife Web based system, we collect a variety of information. This personal data falls into these two categories:

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- 4.3 Contact data includes addresses, email address and telephone numbers when provided through an enquiry form, or profile form
- 4.4 Technical data includes browser type and version, location, operating system and platform and other technology on the devices you use to access the SwageLife Web based system.

## 5. HOW IS YOUR PERSONAL DATA COLLECTED?

- 5.1 We use different methods to collect data from and about you including:
- (a) **Direct interactions** -You may give us your identity, contact and any other data by filling in forms or by interacting with the SwageLife Web based system. This includes personal data you provide when you update your user profile.
  - (b) **Automated interactions** -As you interact with us, we may automatically collect Technical Data about your device, browsing actions and patterns. We may also collect Tracking Data when you use our SwageLife Web based system. We also receive data about you from our analytic provider though this does not identify you.

## 6. HOW AND WHY WE USE YOUR PERSONAL DATA

- 6.1 Under data protection law, to comply with our legal and regulatory obligations, we can only use your personal data if we have a valid reason for doing so.
- 6.2 What we use your personal data for:
- (a) For HR purposes within the SwageLife Web based system
  - (b) For information related to you and your work department
  - (c) To contact you through email to notify you of updates, upcoming events

## 7. THIRD PARTY DATA COLLECTION

- 7.1 Links to external sources and third-party sites such as LinkedIn, Twitter and Facebook may exist from this website. They may request your personal data and we cannot take responsibility once you leave our site.

## 8. WHO WE SHARE YOUR PERSONAL DATA WITH

- 8.1 Outside of our company, we only share data with a third-party supplier for the purpose of offsite data backup. All such backups are transmitted and stored in encrypted form (so not readable) in any location within the United Kingdom.

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- 8.2 We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.
- 8.3 Whilst third party organisations related to IT and software maintenance may have temporary visibility of your information, these organisations do not have permission to use your data and will only be given access if required.
- 8.4 If you wish to discuss this further, please contact us [unsubscribe@london.swagelok.com](mailto:unsubscribe@london.swagelok.com)
- 8.5 We will not sell or lease your personal information to any third parties.

## 9. HOW LONG YOUR PERSONAL DATA WILL BE KEPT

- 9.1 We will keep your personal data throughout your employment period and 7 years post-employment. We will do so for one of these reasons:
- (a) For HR purposes with the SwageLife Web based system;
  - (b) To respond to any questions, complaints or claims made by you or on your behalf;
  - (c) To show that we treated you fairly; and/or
  - (d) To keep records required by law.

## 10. YOUR RIGHTS

- 10.1 Under the General Data Protection Regulation, you have the following rights, which at any time you can exercise:
- (a) Rights of Access: You have the right to be provided with a copy of your personal data.
  - (b) Rectification: You have the right to require us to correct any mistakes in your personal data. You have the right to be forgotten which is the right to require us to delete your personal data in certain situations.
  - (c) Restriction of Processing: You have the right to require us to restrict processing of your personal data.
  - (d) Data Portability: You have the right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format.
  - (e) The Right to Object: You have the right to object however, in some situations this right can be rejected, to support legitimate business or lawful requirements.

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## 11. KEEPING YOUR PERSONAL DATA SECURE

- 11.1 We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way.
- 11.2 We limit access to your personal data to those who have a genuine business need to know it.
- 11.3 Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.
- 11.4 We also have procedures in place to deal with any suspected data security breach.
- 11.5 We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

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