**PRIVACY POLICY**

**Purpose of our Privacy Policy**

This privacy policy aims to give you information on how London Fluid System Technologies Limited (LFST) T/A Swagelok London or any of our other group companies collect and process your personal data.

Other group companies include Swagelok Company, its subsidiaries and its authorised sales and service centres. Details of Swagelok company's Privacy and Data Protection Policy can be found here: **www.swagelok.com/en/privacy-policy**.

**What our policy covers**

We are committed to protecting your personal data and also being transparent about how we collect, use, and share information about you while providing you with the opportunity to receive products and services which enhance your business activities.

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us. This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about yourself.

**Data we collect about you**

We collect data, as detailed below, when you provide it to us, when you use our services, or when other sources provide it to us:

* **Identity data:** We collect identity data including your first name, last name, position, email address and phone numbers.
* **Profile data:** We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases from us.
* **Website data:** We collect content that you submit to our websites. This includes social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in surveys, activities or events. For some of the services supplied on our website you may be asked to provide further details. The information required, and the reason why we need it, will be explained at the time this information is requested. Additionally, we may collect anonymous information about your visit. We will only collect such anonymous information to combine with other anonymous information which is then used and analysed at an aggregate level to help us understand how our customers use our website.
* **Cookies and tracking technologies**: We and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies to recognise you across different services and devices. We may collect anonymous information through the use of various technologies, including cookies. We use cookies to store and tailor our site to meet your personal preferences. You have the option to disallow cookies. Some of these cookies are known as "session cookies", which will last only so long as you stay on our website. If your browser permits it, you may set your computer to reject our cookies although this may affect the quality of your visit to our site.
* **Payment and Transaction data:** We collect certain payment and billing information when you register for certain services including bank account and payment card details, billing address, email address and telephone numbers.
* **Data obtained from third parties:** Occasionally, we may receive information relating to you from third parties. It is our policy to receive information only from such parties which we believe have obtained the information from you legally and fairly. However, we do not control the manner in which third parties collect data. If you believe that a third party has passed to us your personal data against your wishes then you should send us an email at **info@london.swagelok.com**. We will always treat any data that we receive from third parties in the same manner that we treat the personal data we collect.
* **Data obtained from companies we partner with to provide you with a service:** We co-operate with our partners to help market their products and services to you and to assist them in servicing products they supply to your organisation. In doing so the partner may provide us with information including your name, email address, phone number and company, as well as billing and technical information, what products you have purchased or are interested in and other information that may be necessary in order for us to service your needs.
* **Data you provide through our service and support channels**: When you open a support case, speak to one of our consultants directly or otherwise engage with our services or support teams, you will be asked to provide information. For example in the case of a support request you may be asked to provide contact information, details of a problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the problem.

**How we collect data**

We use various methods to collect data from and about you including through:

* **Direct communication:** You may give us your identity, contact, financial, profile and marketing data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you purchase our or our Partner products or services, create an account on our website, subscribe to our service or publications, request marketing to be sent to you, enter a survey, register for an event or give us some feedback
* **Automated interactions:** When you interact with our website, we may automatically collect data about your browsing actions. We collect this personal data by using cookies. Please see our cookie policy for further details.
* **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources in and outside the EEA including data from:
* Analytics providers such as Google and Linked-in
* Advertising networks
* Search information providers
* Contact, financial and transaction data from providers of payment and other services

**How we use personal data**

We will use your personal data for the following purposes:

* **To provide services or support to you:** We will use your personal data to provide and improve our general service to you, including to process transactions with you, authenticate you when you log in and to provide our services including support to you. We may use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyse and to repair application issues you experience.
* **To send you information about services and products we are providing you:** We use your contact information to send transactional communications via email, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests and sending you technical notices, updates, security alerts, and administrative messages.
* **To market, promote and drive engagement with you:** We use your contact information to send promotional communications that may be of specific interest to you, including by email and by displaying ads on other companies' websites and applications, as well as on platforms like Linked-in and Google. These communications are aimed at driving engagement and maximising what you get out of our services, including information about white papers, survey requests, newsletters, product information and events we think may be of interest to you. You can control whether you receive these communications as described below by opting out.
* **To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

Where you have given specific consent to hold information for a purpose and we wish to use the information for another purpose, we will not do so without your express permission.

**Applying the law**

We will only use your personal data in accordance with applicable laws. There are a number of legal bases for processing certain personal data. Most commonly, we will use your personal data in the following circumstances:

* Where we need to perform a contract, we enter into with you.
* Where it is necessary for our legitimate interests in conducting and managing our business in such a manner to give you the best service/product and the best and most secure experience and where your interests and fundamental rights do not override those interests.
* Where we need to comply with a legal or regulatory obligation.
* We do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us, and unsubscribe links are included on every marketing communication.
* We rely on a legal basis for using your data to:
* Register you as a new customer
* Process and deliver our services including to manage collections.
* Manage our relationship with you including notifying you about changes to our privacy policy or terms of service and to gather your feedback regarding our services.
* Register you for an event, complete a survey or provide feedback and information about your use of our services.
* Administer and protect our business and our website.
* To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.
* To provide data analytics to allow us to improve our website, products and services, marketing, customer relationships and experiences.
* To make suggestions and recommendations to you about products or services that may be of interest to you.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent where this is required by law.

**Marketing Communications**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. For marketing purposes we may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. You will receive marketing communications from us if you have:

* Requested information from us;
* Purchased products or services from us;
* Provided us with your details when you attended an event, conference, trade show;
* Provided us with your details when you registered for an event, competition, or promotion; provided us with your details for any other reason;
* And, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any company outside the group of companies for marketing purposes.

**You can Opt-Out at any time**

At any time you can ask us or third parties to stop sending you marketing communications by following the opt-out links on the marketing communication sent to you. Alternatively, you can request to Opt-out by contacting us at any time at: **unsubscribe@london.swagelok.com**.

**Use of Cookies**

Our website provides you with the option to disallow cookies any time you visit our website. You can also set your browser to refuse all or some browser cookies, or to alert you when websites are set or access cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or may not function correctly.

**Disclosure of personal data**

We may share your personal data with other parties:

* Where it is in our legitimate interest to do so and where your interests and fundamental rights do not override our interests
* In order to fulfil a contract we are in, or about to enter into with you
* We are required to comply with a legal or regulatory obligation
* In such events we may disclose your personal data to the parties set out below: .
* Service providers, acting as processors, who may be based within or outside the EEA, who provide IT, software-as-a-service (SaaS), system administration and other services which support the functions of our business.
* Professional advisers, acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based in who may be based within or outside the EEA, who provide consultancy, banking, legal, insurance, accounting and similar professional services.
* Tax authorities, regulators, public bodies, or other parties, acting as joint controllers or processors, based in countries where LFST t/a Swagelok London carries on business operations and where disclosure is required in accordance with applicable law.

**International Data Transfer**

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We share your personal data within the Swagelok network. This will involve transferring your data outside the European Economic Area (EEA). Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

* We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
* Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
* Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

**Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed or used in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, you can ask us to delete your data.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**Your rights where we are the Data Controller**

Where we are the data controller, and under certain circumstances, you have the following rights in relation to your personal data:

* The right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
* The right to request correction of the personal data that we hold about you that is incomplete or inaccurate. We may need to verify the accuracy of the new data you provide to us.
* The right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
* The right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to us processing your personal data on the ground that you feel it impacts your fundamental rights and freedoms.
* The right to request us to suspend the processing of your personal data in the following scenarios: (a) where you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
* The right to request the transfer of your personal data to you or to a third party.
* The right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

**Additional data considerations**

From time to time we may aggregate personal data about our users, to understand usage trends and patterns. Once aggregated, this information cannot be used to identify individual users.

We keep our Privacy Policy under regular review. Any updates will be published online at **www.london.swagelok.com** Please review the policy regularly.

It is important that the personal data we hold about you is accurate and current. It is your responsibility to keep us informed if your personal data changes during your relationship with us.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests (where we are the data controller) within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

**Complaints**

If you wish to make a complaint about our collection or use of your personal data, please contact us at **privacy.complaints@london.swagelok.com** in the first instance, so that we may seek to resolve your complaint.

You also have the right to lodge a complaint with the Information Commissioners Office (ICO), the statutory body which oversees data protection law in the UK.