

PRIVACY POLICY

DATA PRIVACY NOTICE – CUSTOMERS

This notice is provided for our prospective, existing and former customers and their staff (referred to in this notice as “You” and “Your”). This notice (together with our Legal Information on our website (the “Notices”)) tell you about how we process your personal information, including our collection, usage and sharing of your personal information, including in relation to your use of our website (“Website”). We will only process your personal information in accordance with the Notices (and any other information we give to you about how we process your personal information) and in accordance with the Data Protection Legislation.

Meech keeps and processes personal information about you for the provision of our products and services. We will keep it and use it to enable us to run our business and manage our relationship with you effectively, lawfully and appropriately. If you do not wish to provide this information, we may be unable, in some circumstances, to comply with our obligations and we will tell you about the implications of that decision.

As a company pursuing commercial activities, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. We will never process your data where these interests are overridden by your own interests. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. The company may share your data with third parties to provide benefits or for other reasons as documented in this notice. The company may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements in line with our Privacy Policy.

Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or from external sources such as government bodies (HMRC), or referees.

What Personal Data Does the Company Collect about You?

We obtain your personal information from the following sources:

- **From You:** You will know what personal information we obtain from you, because you (or someone you have authorised to deal with us e.g. a member of your staff) has provided it to us.

Examples of how we obtain personal information about you include:

- - When you make an enquiry (such as submitting an enquiry form to us).
 - When you give us information via email or via our website.
 - During a telephone call with us, or during face-to-face discussions with us, for example at an exhibition.
 - Information provided by you via our Website, or via social media messaging.
 - If you report something to us (such as a problem with the Website) or when you send a completed order form to
- **From Marketing Sources:** We love to receive new customers as a result of recommendations from our existing customers and we also actively seek new customers through marketing. We obtain information about prospective new customers, and enquiries from prospective and existing customers from:
 - - Your responses to our online marketing or direct marketing to you, whether you respond by electronic mail, telephone, post, social media or other means.
 - Your interactions with us at exhibitions and other events that we run or attend, such as receiving your business card, and our discussions with you.
 - Your interactions with our online advertising and advertisements placed by our digital media and marketing service providers.
- **From our service providers/third parties:** We receive personal information about you from the following third parties who provide services to us:
 - - Members of our Group of companies.
 - Companies including Distributors outside our Group who we work with from time to time.
 - Our bank or providers who process payments from you, to confirm the outcome of the payment transactions.
 - Data providers, such as our Distributors and trade or magazine websites, which we use to identify (at an early stage) projects and project contacts for which we have relevant products to offer.
 - Print and digital advertisers who may receive your initial enquiries and refer the enquiries to us.
 - Our digital media and marketing service providers who provide us with personal information obtained via social media, being the ability to contact you directly via social media (particularly Linked In, Facebook and Twitter, and if you choose to network with us, respond to our posts, or permit the social network provider allow other users to contact you whether or not they belong to your network).

IP Addresses

We will automatically collect your IP address (an IP address is a number that can uniquely identify a specific computer or other network device on the Internet) each time you visit and use the Website. This allows us to identify the location of users, to block disruptive use and to establish the number of visits from different countries. We analyse this data for trends and for statistical reasons and SEO purposes, such as which parts of the Website users are visiting and how long they are spending there.

For the purposes of online advertising, some service and social media providers, and particularly Google and LinkedIn, Facebook and Twitter, do not provide us with personal information about you but they do use what they know about you in order to present our advertising to you online after you have visited our Website or have been identified (by those social networks) as having an interest in topics or keywords that we place advertisements against. Our Website uses cookies to help us and our online service providers (and particularly Google) to collect information, build a profile about your interests, and direct our advertisements to you when you are browsing the internet. We use your information for SEO purposes. Please see the Cookie Notice information on our Website for more details.

What choices do you have as to the personal information we collect?

To stay in touch with you before and after you place an order with us, as a minimum we need your name, the name of your organisation, and telephone number(s) and/or email address and/or postal address and/or the ability to stay in touch with you via social networks that we use (particularly LinkedIn, Facebook and Twitter), and details of your preferred method of contact, if you tell us of any ("Contact Details"). We may pass the Contact Details, and information about which of our products you are interested in, to our service providers such as those who assist us with telephone follow-up. To complete an order for you, as a minimum we need the following in order to enter into the contract in addition to the Contact Details:

- - The description and quantities of the goods and services you require.
 - The address of the property where You require delivery and/or performance of the services.
 - Your payment details.

This information may be provided to third parties such as our service providers and sub-contractors so that they can assist us (under our instruction) with the fulfilment of your order.

How do you withhold or provide less personal information?

You can control all of our sources of your personal information.

You can:

- - Provide less personal information that we request.
 - Exercise choice about what personal information you provide as long as it is true and accurate (for example, you may have a choice about what payment details you provide to us).
 - Use our Website, or the email address given at the beginning of this notice, to tell us to stop contacting you with our marketing.
 - Not respond to our marketing and communications (and you also have rights to stop our direct marketing to you – please see below).
 - Opt out of the receipt of our newsletters and updates by using the links and details provided in those communications.
 - Change your settings and connections in the online social networks that you use. You can remove us from your network within each social network, choose not to follow us within each network, and choose not to respond to our general posts made within each network. Your social network provider should also give you the ability to opt out of receiving direct messages from us if we are outside your network.
 - Change your internet browser settings to prohibit cookies.

What's the impact of providing less/withholding personal information?

Please note that withdrawing or withholding personal information from us will mean that:

- - Any updates, offers and communications (via advertisements, direct marketing or messages) from us (whether by telephone, email or other means) are not personalised for you.
 - You do not get to receive any updates, offers and communications (if you withhold your Contact Details or tell us not to contact you, or you remove us from your network or choose not to follow us within online social networks).
 - If you do not provide us with the minimum information as listed above, we cannot enter into contract with you for the sale of goods and/or services.

If you ask us to erase any of your personal information, we may be unable to comply with your previous instructions to us about Your personal information in some circumstances. For example, if we erase records of your instruction not to email you, you may receive email from us if we subsequently lawfully acquire your email address from a third party.

Using your Personal Information

How do we use your personal information?

For as long as we have access to your personal information, we will use it for the following purposes, unless otherwise required as a result of your exercising your data protection rights. We may use your personal information for any of the following purposes, whether we obtained it directly from you (or someone you authorise), or another source.

- **Use:** To provide you with our products and/or services in accordance with our contract with you, once you have placed an order.
- **Basis of use:** To perform our contract with you and our legitimate interests.

- **Use:** To process your payment for our products and/or services
- **Basis of use:** To perform our contract with you and our legitimate interests.

- **Use:** To provide you with information that you request from us, or respond to your enquiries made directly to us.
- **Basis of use:** Our legitimate interest in responding to your enquiries.

- **Use:** To take legal or administrative action (including collecting debts, resolving disputes and dealing with regulators) in relation to our supply arrangement with you, including to enforce the terms of the contract.
- **Basis of use:** To perform our contract with you and as necessary to establish, exercise or defend legal claims.

- **Use:** To prepare and send you solicited or unsolicited direct marketing (unless you ask us to stop), consisting of (a) online advertising directed to you via our service providers or (b) direct correspondence with you (via email or social networks) and containing relevant information about products and/or services we provide (including news updates and e-shots). Also to select or de-select you for each of our marketing initiatives.
- **Basis of use:**
 - Existing customers: our legitimate interest in staying in touch with you to discuss potential repeat business.
 - Prospective customers: our legitimate interest in sending you direct marketing to seek business from you, unless you ask us to stop (in which case we will stop).

We may send notifications by email. The emails will include an 'unsubscribe' link. We use cookies. See the cookie notice on our website for more information.

- **Use:** To ensure that features and content from the website are available for you (if you choose them) and are presented in the most effective manner for you and your devices.
- **Basis of use:** Prospective customers: our legitimate interest in sending you direct marketing to seek business from you, unless you ask us to stop (in which case we will stop).

- **Use:** To check and confirm that we carry out your instructions accurately, to enable us to review and improve our products, services and operations to develop new and changed products, services and operations.
- **Basis of use:** Our legitimate interest in providing products, services, choices, operations and websites that meet the requirements of our existing and prospective customers.

- **Use:** To undertake financial management, planning and reporting within our business.
- **Basis of use:** Our legitimate interest in respect of corporate governance and management.

- **Use:** To keep in touch with you by email, social networks or post.
- **Basis of use:** Prospective customers: our legitimate interest in sending you direct marketing to seek business from you, unless you ask us to stop (in which case we will stop). Existing customers: It is lawful for us to contact you by email provided that we give you an easy method to unsubscribe. You can stop us contacting you by email at any time using the links provided in each email or (in the case of social networks) in the ways described above under the heading 'How do you withhold or provide less personal information?'

- **Use:** To share your name, work address & email address with our distributors and international offices for their marketing purposes, unless you opt out from providing information to third parties.
- **Basis of use:** Our legitimate interest in providing products, services, choices and operations that meet the requirements of our existing and prospective clients.

- **Use:** We may cite you as a referee in tenders, and may include case studies about our work with you, unless you tell us otherwise.
- **Basis of use:** Our legitimate interest in ensuring we are able to present effective tenders that contain examples of our work (unless you ask us to stop, in which case we will stop).

Keeping your personal information

How long will we retain your personal information?

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. We will retain Contact Details and records of our contact with you until you ask us to delete them. We will retain details relating to your orders for as long as necessary for us to establish, exercise or defend legal rights. There can be extensive guarantees from our suppliers and in such circumstances we will need to hold personal information consisting at least of name(s), contact details and relevant records (such as correspondence) for extended periods in line with the guarantee given by suppliers.

In determining the appropriate period for the retention of your personal information, we consider the amount, nature and sensitivity of that data, the purposes for which we process your personal information and whether we can achieve these purposes by other means, as well as the applicable legal requirements.

Sharing Your Personal Information

Who do we share your personal information with?

For as long as we have access to your personal information, we may share any of it with any of the following to the extent that they need to have access to your personal information in order to perform their role:

- - Any employee within our organisation and group of companies.
 - Selected third parties who help us to perform our contract with you. This includes third parties who help us directly (such as our partners, distributors product suppliers, order delivery carriers and tele-marketing service providers) and third parties who help us indirectly (such as social media providers that we use and service providers who host and/or transmit data for us).
 - Our banks and other payment processing service providers who process our payments to you.
 - Some of our IT is operated and provided for us by other members of our Group. We and other Group companies use third party IT service providers who maintain, improve, manage, optimise or fix the IT systems that we use or rely on in our business, including computer devices, computer networks, connectivity, telecommunications and software, including our CRM/ERP systems.
 - Our professional service providers, such as accountants, auditors, legal advisers and insurance brokers
 - Any third party company or companies in the event that we go through a business transition, such as a merger, being acquired by another person or company, or selling a portion of our assets.
 - Tele-marketing service providers may be used in lead generation to book meetings into our Salesperson's diary.

When we use tele-marketing companies to help us follow up with you, when they contact they may act as our agent. In such cases, they will introduce themselves as calling from our company.

We reserve the right to disclose your personal information to other third parties if we have lawful grounds to do so, or are under a legal obligation to disclose or share it with them, or in order to establish, exercise or defend our legal rights or to protect the rights or safety of the Company or our staff. This may include, for example, appointed a third party to undertake telesales on our behalf in our legitimate interest of promoting our business.

Do we transfer your personal information abroad?

In some cases we will hold in, or transfer your personal information to a location that is outside the United Kingdom, and even outside the EU. This will be the case if you are located outside of the United Kingdom, or outside the EU and if one of our international offices or Distributors are better able to help you. We also use IT facilities which are based outside of the EU. We also have businesses which are part of our Group, outside of the UK who store personal information locally in the jurisdiction(s) where those businesses operate.

How does the company protect your personal data?

The company takes the security of your data seriously. There are internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees or workers in the performance of their duties.

What if your personal information changes?

It is important that the information we hold about you is correct and accurate. Please tell us if your personal information changes during your relationship with us.

- - **Request Erasure:** of Your personal information. This enables You to ask Us to delete or remove personal information where: (i) there is no good reason for Us continuing to process it; (ii) You have withdrawn Your consent to Our processing; (iii) You have the right to ask Us to delete or remove Your personal information where You have exercised Your right to object to processing (see below) and no exception permits Us to keep using it; (iv) it is established that We did not have the lawful right to process Your personal information; or (v) the law requires Us to erase Your personal information.
 - **Request Correction:** of Your personal information that We hold about You. This enables You to have any incomplete or inaccurate information We hold about You corrected.
 - **Request Erasure:** of Your personal information. This enables You to ask Us to delete or remove personal information where: (i) there is no good reason for Us continuing to process it; (ii) You have withdrawn Your consent to Our processing; (iii) You have the right to ask Us to delete or remove Your personal information where You have exercised Your right to object to processing (see below) and no exception permits Us to keep using it; (iv) it is established that We did not have the lawful right to process Your personal information; or (v) the law requires Us to erase Your personal information.
 - **Object to processing:** of Your personal information where We are relying on a legitimate interest (or those of a third party) and where there is something about your particular situation which makes You want to object to the processing on this ground and there is no exception which applies to permit Us to keep using it or We use it for scientific or historic research purposes or statistical purposes.
 - **Request the restriction of processing of your personal information:** This enables You to ask Us to suspend the processing of personal information about You, for example if You want Us to establish its accuracy or the reason for processing it or You consider we no longer need to use Your personal information for the purposes for which it was collected or used (but You need it to be preserved for the purposes of legal claims). You may also ask us to restrict processing if You have exercised Your right to object to Our use of Your personal information and no exception applies to permit Us to keep using it.
 - **Request the transfer:** of your personal information to a third party.

To exercise your right to any of the above please contact Suzi Lewis, HR Director at suzi.lewis@meech.com or 01993 706700 who will deal with your request.

No fee is usually required

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

What we may need from you

We may need specific information from you to help us to confirm your identity and ensure your right to access the information (or to exercise any other right). This is another appropriate security measure to ensure that the personal information is not disclosed to someone who is not entitled to receive it.

Withdrawing consent

In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please use the facility provided (e.g. the link contained in emails from us if you wish to unsubscribe to email marketing) or contact us using the contact details set out at the beginning of this notice. Once we have received notification of your withdrawal of consent, We will no longer process Your information for that purpose, unless we have another legitimate basis to do so by law. You also have the right to ask us not to process your personal information for direct marketing purposes. You can unsubscribe at any time using the facility provided by email (if you wish to unsubscribe to email marketing) or contact us using the contact details set out at the beginning of this notice.

Data Protection Manager

We are not required to appoint a Data Protection Officer to comply with the law, but we have appointed a Data Protection Lead and the Marketing Director to oversee compliance with this notice. If you have any questions about this notice or how we handle your personal information, please contact us using the contact details set out at the beginning of this notice. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters.

Changes to this Notice

We reserve the right to make changes to this notice from time to time. If this notice changes in any way, we will place an updated version on our Website. Regularly reviewing our Website will ensure that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties. If we make material changes to this notice, we will notify you via a prominent notice on our Website and email footers. If you do not agree to the changes that we make from time to time, please tell us via the contact details set out at the beginning of this notice.

If you have any concerns, please raise these with our Data Protection Lead, Suzi.lewis@meech.com or our Marketing Director iain.cameron@meech.com. You are also able to complain to the Supervisory Authority who's details can be found here <https://ico.org.uk/global/contact-us/>