

HT Moulding Technology Privacy Policy

1. POLICY STATEMENT

Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

2. ABOUT THIS POLICY

2.1 The types of personal data that Moulding Technology may be required to handle include information about current, past and prospective customers and others that we communicate with. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Data Protection Act 1988 and 2003 (as amended) (the Acts) and other regulations. For the purpose of the Acts the data controller is Moulding Technology, Unit 6, Edgeworthstown, Co Longford.

2.2 This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.

2.3 The Data Protection Manager is responsible for ensuring compliance with the Acts and with this policy. That post is held by Sharon Lyons. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Manager by email to Sharon.lyons@mouldtech.net.

2.4 Data Protection concerns the protection of the personal data of living individuals. It safeguards the privacy rights of individuals in relation to the processing of personal data, in both paper and electronic format. Responsibility for ensuring personal data is processed in accordance with data protection legislation lies with the data controller and/or data processor.

2.5 Moulding Technology is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

3. DEFINITIONS OF DATA PROTECTION TERMS

The Acts set out the principles that Moulding Technology must follow when processing personal data. We have set out below some definitions contained in the Acts.

Data is information which is stored electronically, on a computer or in certain paper-based filing systems.

Data subjects for the purpose of this policy include all living individuals about whom we hold personal data. A data subject need not be an Irish National or resident. All data subjects have legal rights in relation to their personal information.

Data Controllers are the people or organisations who determine the purposes for which, and the manner in which any personal data is processed. They are responsible for

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establishing practices and policies in line with the Acts. Moulding Technology is the data controller of all personal data used in our business for our own commercial purposes.

Data Processors include any person or organisation that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition but it could include suppliers which handle personal data on Moulding Technology's behalf.

Personal Data means data relating to a living individual who is or can be identified from the data or from the data in conjunction with other information that is in, or is likely to come into Moulding Technology possession. Examples of Personal Data include name, address, date of birth, telephone number, email address, account number etc.

Processing of Personal Data means any activity that involves the use of the data. We require this information to understand your needs and provide you with a better service. In particular, we will use it for the following legitimate interests of our business:

- Internal record keeping and account management purposes (e.g. verifying your identity and fulfilling orders you place).
- Monitoring, recording and storing telephone or email communications for the purpose of internal training, to improve the quality of our customer service and in order to meet any legal and regulatory requirements.
- Improving our products and services. Contacting you by email, phone or mail for the purpose of account administration and/or processing and fulfilling orders.
- Customising our website according to your interests.
- Periodically sending you promotional mails, emails or SMS messages about new products, special offers or other information which we think you may find interesting using the contact details which you have provided
- Use your information to contact you for market research purposes; and
- Contact you by phone in relation to the above.

4. OBLIGATIONS OF MOULDING TECHNOLOGY AS DATA CONTROLLER

Anyone processing personal data must comply with the six Data Protection principles of good practice. These provide that personal data must be:

- A. Be obtained and processed lawfully and fairly;
- B. Be collected and kept only for specified, explicit and legitimate purposes and not be used or disclosed in a manner incompatible with those purposes for which it was given to you initially
- C. Be protected against unauthorised access, alteration, disclosure or destruction, or unlawful processing;
- D. Be accurate, complete and where necessary, kept up to date;
- E. Be adequate, relevant and not excessive in relation to the purpose for which they were collected;
- F. Not be kept for longer than is necessary;

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5. FAIR AND LAWFUL PROCESSING

5.1 The Acts are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

5.2 For personal data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out in the Acts. These include, among other things, the data subject's consent to the processing, or that the processing is necessary for the performance of a contract with the data subject, for the compliance with a legal obligation to which the data controller is subject, or for the legitimate interest of the data controller or the party to whom the data is disclosed. When sensitive personal data is being processed, additional conditions must be met. When processing personal data as data controllers in the course of our business, Moulding Technology will ensure that those requirements are met.

6. PROCESSING FOR LIMITED PURPOSES

In the course of our business, Moulding Technology may collect and process your personal data. This may include data we receive directly from you (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, business partners, sub-contractors in technical, payment and delivery services, credit reference agencies and others).

7. NOTIFYING DATA SUBJECTS

7.1 If we collect personal data directly from Data Subjects, we will inform them about:

- (a) The purpose or purposes for which we intend to process that personal data.
- (b) The types of third parties, if any, with which we will share or to which we will disclose that personal data.
- (c) The means, if any, with which Data Subjects can limit our use and disclosure of their personal data.

7.2 If we receive personal data about a Data Subject from other sources, we will provide the Data Subject with this information as soon as possible thereafter.

7.3 We will also inform Data Subjects whose personal data we process that we are the data controller with regard to that data, [and who the Data Protection Manage ris].

8.ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING

We will only collect personal data to the extent that it is required for the specific purpose notified to the Data Subject. The processing of the data would be strictly confined to the purposes notified to the Data Subject and or mentioned in this policy and shall not be further processed in any manner incompatible with that purpose(s).

9.ACCURATE DATA

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data as per this policy and in accordance with the regulations stipulated in the Act.

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10. TIMELY PROCESSING

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

11. PROCESSING IN LINE WITH DATA SUBJECT'S RIGHTS

We will process all personal data in line with data subjects' rights, in particular their right to:

- (a) Request access to any data held about them by a data controller
- (b) Prevent the processing of their data for direct-marketing purposes.
- (c) Have inaccurate data amended (see also clause 9).
- (d) Be forgotten – A customer has the right to have their personal data anonymised provided they are not a current customer and they fulfil the internal criteria for this i.e. your balance is zero and you have not had a transaction on your account in over 2 years etc.
- (e) Data portability – a customer has the right to request the personal data that they provided to the Data controller in a downloaded readable format.
- (f) Prevent processing that is likely to cause damage or distress to themselves or anyone else.

12. INFORMATION WE MAY COLLECT

12.1 Types of Personal Data which may be collected by Moulding Technology include:

- Name
- Address
- Telephone number
- Email address
- Account No. / Name
- Financial information e.g. bank details
- We have CCTV in operation in our premises for security reasons and your image may be captured if you attend at our premises in person.

12.2 Information you give us.

You may give us information by filling in forms on our website (our site) www.mouldingtechnology.com or by corresponding with us by phone, e-mail or otherwise.

13. DISCLOSURE OF YOUR INFORMATION

13.1 We may share your information with selected third parties including:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Moulding Technology,

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our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

14. DATA SECURITY

We will process all personal data we hold in accordance with our Data Security Policy.

14.1 We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself.

14.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

14.3 Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

14.4 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

Confidentiality means that only people who are authorised to use the data can access it.

Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.

Availability means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on Moulding Technology' central computer system instead of individual PCs.

14.5 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

15 TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA

15.1 We may transfer any personal data we hold to a country outside the European Economic Area ("EEA"), provided that one of the following conditions applies:

15.1.1 The transfer is necessary for one of the reasons set out in the Acts, including the performance of a contract between Moulding Technology and the data subject, or to protect the vital interests of the data subject.

15.1.2 The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.

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15.1.3 The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

15.2 Subject to the requirements in clause 3 above, personal data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. That staff maybe engaged in, among other things, the fulfilment of contracts with the data subject, the processing of payment details and the provision of support services.

16. YOUR RIGHTS

The Acts lay down strict rules about the way in which personal data and sensitive personal data is collected, assessed, used and disclosed. Data Subjects have the following rights under the Acts.

16.1 Access:

The Acts permit data subjects to access their personal data on request in writing to the Data Protection Manager and, if they find that any data is incorrect, they have the right to have this data corrected, erased or restricted.

All data subject access requests must be made in writing, addressed to the Data Protection Manager in Moulding Technology. For your assistance, we include sample wording below:

Dear

I wish to make an access request under Section 4 of the Data Protection Acts 1988 and 2003 for a copy of my personal data held by you, in relation to.... (Fill in as much information as possible to assist Moulding Technology to locate the data that you are interested in accessing e.g. customer account number etc.

In order to protect our customers' personal data, we may ask you for information to enable us to correctly identify you.

17 MARKETING

You have the right to opt out so that we will not process your personal data for marketing purposes. You can also exercise the right at any time by writing to us at our address or email us at info@mouldtech.net.ie or simply call us on 043-6672623.

18 DATA RETENTION

We will retain your data on your account in order to be able to service your account. This data will be retained on your account for 7 years after the date of your last invoice for legal reasons.

Should you no longer be a customer of Moulding Technology for at least 2 years from your last invoice date and have zero balance on your account you may request for your data to be anonymised. This request can be put in writing to our Data Protection Manager at the details listed below.

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19 CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on our webpage and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

20 CONTACT/COMPLAINTS

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Moulding Technology' Data Protection Manager:

Sharon Lyons at sharon.lyons@mouldtech.net

Should you be dissatisfied with our responses, you may contact the Irish Data Protection Commissioner. Contact details for the Irish Data Protection Commissioner, as well as information on the Irish Data Protection Acts 1988 and 2003, may be found at the Data Protection Commissioner's web site <http://www.dataprotection.ie>.

21 FAQ's

Here are some FAQ's that may help you with any query you may have in relation to Data Protection and the data we hold on you;

- What do you do with my data? The protection of your personal data is a priority for Moulding Technology. We offer you a better standard of service by using your personal data for the following legitimate interests of our business:
 - (a) Contacting you by mail and email about your account with invoices, balances and other important information;
 - (b) Telling you by mail about products and offers which we think will be relevant to you;
 - (c) Where you have bought from us in the last 12 months, contacting you by e-mail and/ or SMS about our news and offers;

- How do you protect it? We look after your personal information at all times by using appropriate security and technical controls. Anyone who works with us handling your data has to comply with strict standards of European data protection law. All our people are trained to respect your data.
- How long will you hold it? Where we are using your data to send you marketing information we will hold it for 7 years .
- What do you hold? You can ask us at any time what information we hold about you; just drop us a line at the address below.
- Who will you give it to? We will not sell or distribute your personal information to anyone else unless we have your permission or are required by law to a person authorised to obtain data under specific legislation
- I don't want any more marketing. If you do not want to receive any more marketing material from us by email, post or telephone, just contact as the details below and we will stop immediately. We will still hold your information where we are legally obliged to do so. You can also ask us to stop using your information or erase your

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personal information from our systems as long as we do not have to keep it for legal reasons.

- I want to know more: Please contact us if you would like any of the following: what information is being processed; a copy of information that is being processed; correction of information being processed; deletion of information held on you (commonly known as the right to be forgotten); to restrict processing; to request your data be handed over to someone else; object to the processing of your information.
- Who are you? We are Moulding Technology
- How can I contact you? E-mail us at info@mouldtech.net; call us on 043-6672623 or write to us at Moulding Technology, Unit 6 Edgeworthstown Business Park, Edgeworthstown, Co Longford. It is always good to hear from you.
- Still not happy? We will always try to resolve your concerns. In the unlikely event that you are still concerned, you can contact the Irish Data Protection Commissioner. Contact details for the Irish Data Protection Commissioner, as well as information on the Irish Data Protection Acts 1988 and 2003, may be found at the Data Protection Commissioner's web site <http://www.dataprotection.ie>.