



# EURO ALLOYS

## PRIVACY STATEMENT

**Last Modified:** 11 December, 2018

This Privacy Statement explains how Euro Alloys Ltd ("EA" "we," "us," or "our") collects, uses, and discloses your information. The Privacy Statement applies to all services and products, except those products that have a separate Privacy Statement.

Where applicable, you consent to the use of your information as described in this Privacy Statement each time you use our products or services, so we urge you to read this document in full, and contact us if you have any questions.

## COLLECTION AND USE OF PERSONAL INFORMATION

Personal information is information that can be used to directly or indirectly identify you. Personal information also includes anonymous information that is linked to information that can be used to directly or indirectly identify you. Personal information does not include information that has been irreversibly anonymized or aggregated so that it can no longer enable us, whether in combination with other information or otherwise, to identify you.

Here is a description of the types of personal information we may collect and how we may use it:

### What Personal Information We Collect

Depending on the products and services you use, we collect different kinds of personal information from or about you.

- **Information you provide:** We may collect the personal information you provide—such as your name, username, or email address—when you use our products and services, create an account, contact us, participate in an online survey, participate in community discussions or chat rooms, apply for employment, interact with us at in-person events, or otherwise interact with us.
- **Information about payments:** If you make a purchase, we collect personal information in connection with the purchase. This information includes payment information, such as your bank number and sort code; other account and authentication information; and billing, shipping, and contact details.

#### **Sales Office / Registered Office**

Euro Alloys Limited, One Croydon, 9<sup>th</sup> floor, 12-16 Addiscombe Road, Croydon CR0 0XT  
Tel: +44 (0) 20 8768 2290 – Fax: +44 (0) 20 8768 2299  
Reg. Number: 2474338

#### **Accounting/Shipping Office**

Euro Alloys Limited, Suite 3, Elm Court, Cowbridge Road, Bridgend, Wales CF31 3SR  
Tel: +44 (0) 1656 644666– Fax: +44 (0) 1656 660150



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- **Information about use of our Website:** When you visit our websites, 3<sup>rd</sup> parties (Microsoft, GoDaddy, Google etc.), may collect information about the type of device you use, your device's unique identifier, the IP address of your device, your operating system, the type of Internet browser that you use, usage information, diagnostic information, browsing information, session summary information, file attributes (including attributes for photos, videos, music, and documents), and location information from or about the computers, phones, or other devices on which you install or access our products or services. **We do not** gather some of this information automatically.
- **Information from third parties:** We may collect contact information from third parties, including business partners and marketing agencies. This includes your contact information from marketing partners.

## How We or Suppliers Use Your Personal Information

Generally speaking, we use personal information to provide, improve, and develop our products and services, to communicate with you, to offer you targeted advertisements and services, and to protect us and our users.

EA, collects, processes, and determines how to process your personal information as data controller for the following purposes:

- **Providing, improving, and developing our products and services:** We use personal information to help us provide, improve, and develop our products, services, and marketing. This includes using personal information for purposes such as data analysis, research, and audits. Such processing is based on our legitimate interest in offering you products and services and for business continuity.
- **Communicating with you:** Subject to your prior express consent, we may use personal information to send you marketing communications in relation to our products and services; communicate with you about your account, transactions, or employment requests; and inform you about their policies and terms. **We do not** share personal information with third-parties. If you no longer wish to receive email communications for marketing purposes, please contact us to opt out.

*For any of the uses of your data described above that require your prior express consent, note that you may withdraw your consent by contacting us.*

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## COOKIES AND SIMILAR TECHNOLOGIES

We/Suppliers may use cookies and similar technologies to provide, protect, and improve our products and services, such as by personalizing content, offering and measuring advertisements, understanding user behaviour, and providing a safer experience.

You can remove or reject cookies using your browser or device settings, but in some cases doing so may affect your ability to use our products and services.

Please read our **Cookie Statement** to learn more about how we use cookies and the choices you have.

### Assignment

In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, or sale or disposition of all or any portion of our business, including in connection with any bankruptcy or similar proceedings, we may transfer any and all personal information to the relevant third party.

### Legal Compliance and Security

It may be necessary—by law or as a result of legal process, litigation, or requests from public or governmental authorities within or outside your country of residence—for us to disclose personal information. We may also disclose personal information if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose personal information if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

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## YOUR RIGHTS

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date. Depending on where you live, you may have the rights described below.

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 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. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to 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 processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if 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.

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- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 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. We will advise you if this is the case at the time you withdraw your consent.

You have the right to access, correct, or delete the personal information that we/Suppliers collect. You are also entitled to object to or restrict, at any time, the further processing of your personal information. You have the right to receive your personal information in a structured and standard format. You may lodge a complaint with the competent data protection authority regarding the processing of your personal information.

To protect the privacy and the security of your personal information, we may request information from you to enable us to confirm your identity and right to access such information, as well as to search for and provide you with the personal information we maintain. There are instances where applicable laws or regulatory requirements allow or require us/Suppliers to refuse to provide or delete some or all of the personal information that we maintain.

You may contact us or our suppliers to exercise your legal rights. We will respond to your request in a reasonable timeframe, and in any event in less than 30 days.

## **CLOSING ACCOUNTS**

Please contact us to close your account in relation to the following uses of your personal information:

- providing, improving, and developing our products and services;
- communicating with you;
- offering and measuring targeted advertisements and services;
- promoting safety and security; or
- providing products and services

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If you close your account, we have no obligation to retain your information, and we may delete any or all of your information without liability. We may retain, however, information related to you if we believe it may be necessary to prevent fraud or future abuse, if required by law, or for legitimate purposes, such as analysis of non-personal information, account recovery, auditing our records, or enforcing our rights and obligations under our agreements.

## **THIRD-PARTY WEBSITES AND SERVICES**

Our products and services, including our websites and digital media properties, may contain links to or the ability for you to access third-party websites, products, and services. We are not responsible for the privacy practices employed by those third parties, nor are we responsible for the information or content their products and services contain. This Privacy Statement applies solely to information collected by us not our Suppliers. We encourage you to read the privacy policies of any third parties before proceeding to use their websites, products, or services.

## **INFORMATION SECURITY, INTEGRITY, AND RETENTION**

It is important that you take precautions to protect against unauthorized access to your EA account credentials, and computers or other devices. If you feel that the security of your account or personal information has been compromised, please immediately contact us. Please be aware that, despite our efforts, no security system is impenetrable. In the event of a security breach, we will promptly notify you and the proper authorities if required by law.

We will retain your personal information for as long as it is necessary to fulfil the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

## **CHILDREN**

We do not knowingly collect, use, or disclose information from children under 16. If we learn that we have collected the personal information of a child under 16—or the equivalent minimum age depending on the jurisdiction, such as 13 in the United States—we will take steps to delete the information as soon as possible. Please immediately contact us if you become aware that a child under 16 has provided us with personal information.

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## CHANGES TO THIS PRIVACY STATEMENT

We may periodically change this Privacy Statement to keep pace with new technologies, industry practices, and regulatory requirements, among other reasons. We expect most such changes to be minor. Any non-material changes will take effect immediately upon posting of an updated Privacy Statement. There may, however, be cases where changes to the Privacy Statement may be more significant. In such cases, we will provide you either a prominent notice of such changes before they take effect or by directly sending you a notification.

Your continued use of our products and services after the effective date of the Privacy Statement means that you accept the revised Privacy Statement. If you do not agree to the revised Privacy Statement, please refrain from using our products or services and contact us to close any account you may have created.

## CONTACT US

If you have any questions regarding this Privacy Statement or its implementation, you may e-mail our Data Protection Officer: Estelle Le Pors, [pa@euro-alloys.com](mailto:pa@euro-alloys.com). You also may write to us at: One Croydon, 9<sup>th</sup> Floor, 12-16 Addiscombe Road, Croydon, CR0 0XT.

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