

Oventrop UK Limited – Privacy Notice

Welcome to Oventrop UK Limited's ("Oventrop UK") privacy notice.

This privacy notice provides information on how Oventrop UK collects and processes your personal data when you purchase a product or service from us. Your personal data will be handled by Oventrop UK in accordance with this policy and with the General Data Protection Regulations (GDPR).

Oventrop UK is part of the Oventrop Group ("the Oventrop Group"), it is therefore important that you read this privacy notice together with the Group's Privacy Statement that can be accessed via Oventrop UK's website (<https://www.ventrop.com/en-GB/privacystatement>).

1. Important information and who we are

Oventrop UK is the controller and responsible for your personal data.

Oventrop UK is part of the Oventrop Group and data may therefore be transferred to the Group where necessary to fulfil our contract of services with you.

Oventrop UK has appointed a Data Privacy Manager. If you have any questions about this privacy notice or our data protection practices at Oventrop UK, please contact the Data Privacy Manager in the first instance.

The Oventrop Group has appointed an external DPO, who can be contacted at datenschutz@ventrop.de.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Oventrop UK Limited (Company Number: 02717240)

Registered address: Oventrop House Hatch Industrial Park, Greywell Road, Basingstoke, Hampshire, RG24 7NG

Name or title of Data Privacy Manager: Estelle Harris, Operations Manager

Email address: estelleharris@ventrop.co.uk

Postal address: Oventrop House Hatch Industrial Park, Greywell Road, Basingstoke, Hampshire, RG24 7NG

2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data, such as the below, about you:

- Identity Data – this includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data – this includes billing address, delivery address, email address and telephone numbers.
- Financial Data – this includes bank account and payment card details.
- Transaction Data – this includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data - this includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

- Profile Data – this includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data – this includes information about how you use our website, products and services.
- Marketing and Communications Data – this includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We use different methods to collect data about you, all of which are explained in the Group's Privacy Statement.

If you fail to provide personal data:

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.

3. How we collect your data

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

Direct interactions: you may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

Automated technologies and interactions: as you interact with our website, we may automatically collect Technical Data about your equipment, browsing interactions and patterns. We collect this personal data by using cookies and other similar technologies.

Third parties or publicly available sources: we may receive personal data about you from various third parties and public parties.

4. How we use your personal data

We will only use your personal data for the purpose for which we collected it and where the law allows us to. Most commonly, we will use your personal data in order to perform the contract we are about to enter into with you, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests and where we need to comply with a legal obligation.

We may use your personal data in circumstances such as the following:

- To register you as a new customer.
- To process and deliver your order.
- To manage your relationship with us.
- To enable you to complete a survey.
- To improve our website, products/services, marketing or customer relationships.

- To recommend products or services which may be of interest to you.
- To fulfil our contract with you.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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, in compliance with the above rules, where this is required or permitted by law.

5. How we share your personal data

We may share your personal data within the Oventrop Group.

We only transfer data to third parties if this is necessary in order to perform the contract. We will not pass your data to third parties, e.g. for advertising purposes, without your express consent.

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.

6. International transfers

We may transfer, store and process your personal data outside the European Economic Area. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it and only to countries that have been deemed to provide an adequate level of protection for personal data.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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.

8. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will 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.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk).

You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

10. Further details

If you are looking for more information on how we process your personal data including on data security, data retention and lawful processing bases, please contact our Data Privacy Manager.

Issued September 2019