

# The Sempre Group Ltd

# Privacy Policy

V2.0 (June 2018)

## CONTENTS

• <b>1. Introduction</b>	Page 3
• <b>2. Who we are</b>	Page 3
• <b>3. Collection of personal data</b>	Page 4
• <b>4. Data storage</b>	Page 5
• <b>5. Sharing of data</b>	Page 5
• <b>6. Data retention</b>	Page 5
• <b>7. Lawful basis for processing of personal data</b>	Page 6
• <b>8. Your rights as a data subject</b>	Page 7
• <b>9. Contact Us</b>	Page 8
• <b>10. Complaints</b>	Page 9

## 1. Introduction

The current Privacy Policy relates to the changes made in preparation for the General Data Protection Regulation (GDPR) in May 2018.

The current Privacy Notice explains how we collect, use and protect your personal data.

## 2. Who we are:

The Sempregroup is a Limited Company, Registered in England 3904246, VAT number 742160951 with the Resisted Office address at The Lodge, 37 Barnett Way, Barnwood, Gloucester, GL4 3RT, United Kingdom.

### Personal Data

We hold data about customers, potential customers, our employees, our suppliers and data associated with the Website.

Categories of personal data we hold for Customers and Potential Customers

- Contact name;
- Contact address;
- Contact telephone number (mobile and landline);
- Contact email address;
- Contract details (where appropriate);

The websites that is within the scope of this Privacy Policy is:

- [www.thesempregroup.com](http://www.thesempregroup.com)
- [www.sempre-metrology.com](http://www.sempre-metrology.com)
- [www.sempre-instruments.com](http://www.sempre-instruments.com)
- [www.sempre-lean.com](http://www.sempre-lean.com)
- [www.sempre-engineering.com](http://www.sempre-engineering.com)

### Website data

- Internet Protocol (IP) Address; information about a visit

### 3. Collection of personal data:

#### Customer and potential customer data

- Contact name to address customers, or potential customers directly;
- Contact address to address customers, or potential customers directly;
- Contact telephone number (mobile and landline) to address customers, or potential customers directly;
- Contact email address to address customers, or potential customers directly;
- Contract details (where appropriate) to provide the appropriate services to our customers

We collect personal data from you for one or more of the following purposes:

- To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest
- To initiate and complete commercial transactions with you, or the entity that you represent, for the purpose of products and / or services
- To fulfil a contract that we have entered into with you or with the entity that you represent
- To manage any communication between you and us

#### Website data

In order to ensure that each visitor to any of our websites can use and navigate the site effectively, we collect the following information:

- Internet Protocol (IP) Address, to receive and send information from and to visitors to our website.
- We collect data about visitors to our website and browsing patterns. This data is only used in anonymous form and individuals are not identified.

## 4. Data storage

All data is stored locally with Metrology Direct or in Cloud services located within the European Union (EU).

Data stored locally is held on Metrology Direct owned equipment.

Security of that data complies to the Government backed Cyber Essentials Scheme which includes:

- Use of 20+ digits security to access any data. These passwords are changed at regular intervals to ensure that only authorised people can access the server and the Cloud based accounts.
- Controls on access to the data. Access is restricted to only those persons authorised to see the data.

## 5. Sharing of data

Metrology Direct will only share your data in the following situations:

- Storage in the cloud. Metrology Direct use Microsoft cloud storage for this purpose.
- Occasionally we may need to share contact details and company owned data with our suppliers in order to identify the best technical solution or to resolve a support call. You will always be informed of this.
- We may have to disclose data as instructed by law enforcement agencies.

Other than for the purposes highlighted above Metrology Direct will not share your details with any other third parties.

## 6. Data retention

Customer and potential customer data: All customer data is stored for 10 years after the last interaction or last contact and then securely destroyed.

Communicating with you: Metrology-Direct will communicate with you via direct emails, electronic automated messages (e-newsletters), telephone, fax.

The aim of the communication is to:

- Inform you of new or improved products or services offered by Metrology-Direct
- Inform you of new or improved services offered by Metrology Direct on behalf of our partners
- Provide ongoing information regarding product updates, improvements or new accessories for products that you have purchased from us
- Transaction information: to inform about the processing of financial transactions degenerated by purchasing of products and services; for accounting purposes

Customers have the option to update their communication preferences and may opt out of the communications at any time by following the instructions in the specific message.

## **7. Lawful basis for processing of personal data:**

### **Contractual fulfilment:**

- To provide, on request, appropriate information about the product or services
- Communication associated with the delivery of the contracted products or services
- To process purchase transactions for products and services with customers
- Processing of payment requirements in order to fulfil purchases
- Actual delivery of products and services in physical or digital forms

### **Legitimate interest:**

- To provide further information about related products or services for identified areas of interest

- Follow-up to ensure requested information meets the needs of the customer, potential customer

**Consent:**

- Personal contact information as provided through website forms or at trade shows, symposium, conferences, events or any other means

## 8. Your rights as a data subject

### The right to be informed

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

### The right of access

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them.

### The right to rectification

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

### The right to erasure (the 'right to be forgotten')

Where no overriding legal basis or legitimate reason continues to exist for



processing personal data, you may request that we delete the personal data. We will take all reasonable steps to ensure erasure.

### **The right to object**

You have the right to object to our processing of your data where

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research;
- Processing involves automated decision-making and profiling.

If you wish to exercise any of these rights, please contact: [marketing@thesempregroup.com](mailto:marketing@thesempregroup.com) stating what right you would like to exercise. In specific circumstances, we might ask for proof of identification only for verification purposes.

## **9. Contact us**

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to [marketing@thesempregroup.com](mailto:marketing@thesempregroup.com)

Alternatively, you can contact us at our registered address using the following postal address or telephone numbers:

The Sempregroup Ltd

The Lodge, 37 Barnett Way, Barnwood, Gloucester, GL4 3RT

United Kingdom

Telephone: +44 (0)1452 632 712



## 10. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the United Kingdom, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Contact information can be found at <https://ico.org.uk/global/contact-us/>.