PRIVACY POLICY

The Expanded Metal Company Limited (also t/a ExMesh Engineering) (hereon in collectively referred to as "**we**", "**us**" or "**our**") are committed to protecting your privacy and meeting the requirements of the UK data protection legislation. The Expanded Metal Company Limited is the controller and responsible for this website. This privacy policy explains:

- what personal data we collect about you;
- why we collect that personal data;
- who we share your personal data with;
- why we might contact you and how you can change your contact preferences;
- international data transfers;
- how we keep your personal data secure;
- data retention; and
- the rights you have in relation to your personal data.

"Personal data" referred to within this privacy policy covers any information which could be used to identify you, either directly or indirectly, for example in combination with any other information we may hold about you. This privacy policy covers the use of your personal data collected about you during any interaction you may have with us. It covers the collection of personal data by telephone, via our websites (<u>www.expandedmetalcompany.com</u> & <u>www.exmeshengineering.com</u>) (the "**Websites**") and from our pages on third party social media channels such as LinkedIn, X and YouTube.

Please read this privacy policy carefully to understand our practices regarding your personal data. If you have any questions, comments or concerns about any aspect of this privacy policy, please contact our Customer Service team on sales@exmesh.co.uk or +44 (0) 1429 867 388.

PERSONAL DATA COLLECTED BY US

We may collect and use personal data about you and we collect this personal data in several ways, including but not limited to:

Personal data you share with us: When you order from us, either on our Websites, by telephone or EDI, when you register for The Expanded Metal Company Limited or ExMesh Engineering account or when you sign up to our mailing lists, we may ask for your name, email address, invoice address, delivery address, telephone number, credit or debit card number, billing address, card CVC number, the card's expiry date and a contact phone number for the registered address of the card. During interactions, you may be asked if you would like to provide your name, e-mail address or other contact information. In addition, we may collect information about how you use our products and services.

Personal data we collect about you: We collect some personal data, as well as other information in the form of anonymous or aggregate statistics, when you use our Websites and third party suppliers (including but not limited to Stripe and Eventbrite). We may collect photographs and videos with your image on, technical data including, but not limited to, 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 our Websites. In addition, we may collect information about how you use our Websites.

Personal data we receive from other sources: When you interact with us or use any of our pages on social media sites, such as Youtube, LinkedIn and X, we may collect information about you which could include personal data, (e.g. your name and account username). For example, when you "Like" a post on LinkedIn or "Follow" us on X. Those social media sites will also have their own privacy policies

explaining how they use and share your personal data. You should carefully review those privacy policies before you use those social media sites, to make sure that you are happy with them.

Not all of the information used for these purposes is "personal data"; some of it is anonymised or used on an aggregate basis. We may collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any special categories of personal data about you. Nor do we collect any information about criminal convictions and offences.

WHY WE COLLECT YOUR PERSONAL DATA

Personal data you share with us: We use the personal data you share with us to:

- provide you with our products and to fulfil orders that you place with us on our Websites, through our customer service team and EDI;
- create and help you manage your customer account;
- allow you to request a return of your product purchased from us, if you change your mind;
- respond to your questions and requests;
- send you newsletters, updates, promotions and product highlights;
- notify you of other products we think you might like based on your previous purchase(s);
- remind you of what you may be missing if you have put items in your "Shopping Bag" on our Websites and then abandon them; and
- send you information on any changes we make to our policies or terms.

Personal data we collect about you: We use the personal data we collect about you to:

- tailor the way that you interact with us in the future, so that we tailor certain communications and also show you certain highlights, products or offers which we think you may be interested in; and
- analyse how our Websites are used, so that we can constantly improve the services that we
 offer.

More details on how we use your personal data can be found in the table below.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered 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;
- where we need to comply with a legal obligation; and
- where we have your consent.

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 personal 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 our products 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.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/activity	Type of personal data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer.	Name, email address, phone number, delivery address, password, job title and relevant place of work.	Performance of a contract with you.
To manage and respond to your enquiries, including but not limited to, providing you with information you have requested.	Name, email address, phone number, delivery address, job title and relevant place of work.	Necessary for our legitimate interests (to provide you with the information you have requested from us).
To share articles, case studies, webinars, videos and other news on our Websites showcasing our work, projects and other business-related activities.	Name, relevant place of work, photo and recorded image.	 a) Necessary for our legitimate interests (to showcase our business- related activities to current and potential customers). b) Consent.
To add you to our Expert Preferred Installer Directory.	Name, email address, phone number and relevant place of work.	 a) Performance of a contract with you. b) Necessary for our legitimate interests (to showcase our contractors and others who assist us in the delivery of our products and services).
To register your attendance to, and deliver our ExPert Preferred Installer Programme.	Name, email address, job title and relevant place of work.	Performance of a contract with you.
To process and deliver your order, including but not limited to: a) managing payments, fees and charges; and b) collecting and recovering money owed to us.	Name, email address, phone number, delivery address, bank account and payment card details, purchase history (including attendance to our webinars), job title, relevant place of work and marketing and communications preferences.	 a) Performance of a contract with you. b) Necessary for our legitimate interests (to recover debts due to us). c) Consent.
 To manage our relationship with you, including but not limited to: a) notifying you about changes to our terms or privacy policy; and b) asking you to leave a review or take a survey. 	Name, email address, phone number, delivery address, job title, relevant place of work and marketing and communications preferences.	 a) Performance of a contract with you. b) Necessary to comply with a legal obligation. c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products). d) Consent.
To make suggestions and recommendations to you about our products and services that may be of interest to you.	Name, email address, phone number, delivery address, job title, relevant place of work and	a) Necessary for our legitimate interests (to develop our products and

	marketing communications preferences.	services and grow our business). b) Consent.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	Name, email address, phone number, technical data, information relating to your use of our Websites and marketing and communications preferences.	 a) Necessary for our legitimate interests (to study how customers use our products and services, to develop them, to grow our business and to inform our marketing strategy). b) Consent.
To use data analytics to improve our Websites, products and services, marketing, customer relationships and experiences.	Technical data and information relation to your use of our Websites.	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Websites updated and relevant, to develop our business and to inform our marketing strategy).
To administer, operate and protect our business and our Websites (including, but not limited to, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Name, email address, phone number, delivery address and technical data.	 a) Necessary to comply with a legal obligation. b) Necessary for our legitimate interests (including, but not limited to, running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation, sale, asset transfer or group restructuring exercise).

SHARING OF PERSONAL DATA: WE MAY SHARE YOUR PERSONAL DATA WITH THE FOLLOWING THIRD PARTIES:

- internal third parties means other companies in The Expanded Metal Company Limited group of companies (including, but not limited to, Sorst Streckmetall) who are based inside and outside the UK and provide IT and system administration services and undertake leadership reporting;
- service providers who help us to operate our Websites, fulfil your orders and deliver our products to you; for example, credit reference agencies, couriers, payment providers, distributor partners, IT support and so on;
- professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services; and
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

Some information is collected using cookies and other similar technologies. You can find more information on what cookies and technologies are used, how they are used, and your options for changing how we use them in the section below on "Cookies" and in our Cookies Policy.

If we decide to sell, transfer or merge any parts of our business or our assets, we may also need to share your personal data with the buyer/new owner of those parts of the business or assets. In those circumstances, we will make sure that any new buyer/new owner will promptly give you details of how they will use your personal data, and your options for changing that.

RECEIVING CONTACT FROM US AND CHANGING YOUR CONTACT PREFERENCES

From time to time, we may send you aftercare e-mails relating to your product purchased from us. We may also send you e-mails with information in relation to any products which are similar to your product, and which we think you might like. We will also only share your personal data with our internal third parties for them to send you marketing e-mails, if you have agreed that we can. If you have registered for an account with us, when shopping online and you have put items in your "Shopping Bag" and then abandoned them, we may send you e-mails to remind you of what you may be missing.

In any case, you can ask us to stop contacting you at any time by contacting us on <u>sales@exmesh.co.uk</u> or +44 (0) 1429 867 388 or by using the unsubscribe option in each e-mail.

INTERNATIONAL DATA TRANSFERS

The personal data that we collect about you may be transferred to, accessed, used or stored in, a country outside the UK, either by us or by any of the third parties that we share your personal data with. We will make sure that any transfer of your personal data by us or by those third parties, complies with the UK data protection legislation. In any case, the transfer, access and use of your personal data will continue to be governed by this privacy policy. By submitting your personal data, you agree to this transfer, access and use of your personal data outside the UK.

SECURITY OF PERSONAL DATA

We care about your personal data and know that you trust us to keep it secure. We use appropriate technical and organisational measures, including encryption, to protect your personal data, and review those regularly. Unfortunately, the transmission of personal data 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 personal data on transmission via the internet.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Websites (for example, for your customer account), you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

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.

PERSONAL DATA AND YOUR RIGHTS

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

data. Please click on the links below to find out more about these rights:

- <u>request access to your personal data;</u>
- request correction of your personal data;
- request erasure of your personal data;
- object to processing of your personal data;

- request restriction of processing your personal data;
- request transfer of your personal data; and
- right to withdraw consent.

If you would like to exercise any of the rights set out above, please contact us on sales@exmesh.co.uk or +44 (0) 1429 867 388.

You also have the right to make a complaint at any time to the Information Commissioner's Office ("**ICO**"), the UK regulator, for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

THIRD PARTY SITES

Our Websites may contain links to other websites and social media sites operated by third parties. Please note that we have no control over how those third parties collect and use your personal data. Those third party sites may have their own privacy policies. You should always read the privacy policy of each website you visit carefully.

COOKIES

Our Websites use cookies to collect information about you, including some personal data. "Cookies" are small data files which are placed on your device via your web browser when you visit the Websites. Any personal data collected by those cookies will be used in accordance with the relevant Website's cookie policy and this privacy policy. You can find more information on what cookies we use, how we use them, and your options for changing how we use them in our Cookies Policy.

CHANGES

From time to time we may make changes to this privacy policy. If we decide to do so we will post the changes on our Websites so that you are always aware of what personal data we collect about you, and how we use it. If we need to, we will e-mail you with details of those changes and/or ask you to confirm that you are happy with them.