

Labcold Limited - Privacy Statement

At Labcold Limited we are committed to processing personal information about our customers/suppliers in ways that comply with our legal obligations as well as being clear with our contacts about what we do with their personal information. The key points of Labcold's Limited privacy statement are:

- ❄ We don't sell your data to third parties
- ❄ We do use your data to help us provide great customer service, which includes tailoring the information we share with you to help ensure that it's relevant, useful and timely

We are Labcold Limited, Cherrywood, Chineham Park, Basingstoke, Hampshire, RG24 8WF. We share your concern about the protection of your personal information and are committed to safeguarding your privacy. This document covers information we collect about you, whether via our website: www.Labcold.com, through our customer service centre, from discussion with our product specialists, telephone contact or otherwise. Please read it carefully to understand how your personal information will be treated.

We will be the "controller" of the personal information which you provide to us or which we collect from you.

Personal information that we collect

We collect a range of personal information relating to you, including your:

Name

Email address

Telephone number

Credit or debit card information and/or other payment information

IP address

Any other personal information that you choose to provide to us when you complete our online Contact forms or otherwise make contact with us.

How we use your personal information

We use your personal information as follows:

To maintain our relationship with you whilst you are a customer

To process orders and provide agreed goods and services to you

For invoicing, processing payments, account set up and maintenance

To communicate with you, including to respond to information requests /enquiries submitted To obtain your feedback on our products and services

To notify you about changes to our products and services

To decide on and notify you about price changes

To monitor the quality of our products and services

To investigate any complaint you make

To provide evidence in any dispute or anticipated dispute between you and us

To customise various aspects of our Website to improve your experience;

To pre-complete online forms on our Website. For example, if you have provided an address when using one service, the Website computers may automatically fill in that information elsewhere to save you time.

As we may otherwise consider necessary to support the operation of our Website;

To obtain credit references, credit checks for debt collection, fraud detection and risk management purposes;

To monitor and/or record telephone conversations to or from you in order to offer you additional security, resolve complaints, improve our service standards and for staff training purposes;

To protect the rights, property, and/or safety of Labcold limited, its personnel and others.

for logistical purposes, including to plan delivery routes to fulfill your requirements

Marketing

We will only send you direct marketing in relation to our own products and services by email for informative purposes where you have consented to this; or where you have not objected to this, and we are marketing similar products and services to those which were the subject of a previous sale or negotiations of a sale to you.

Your agreement to the use of your personal information for direct marketing purposes is optional and if you choose not to consent, your visit to and use of our Website will not be affected. You can choose to opt out of receiving direct marketing information from us at any time:

Through the 'Unsubscribe' link at the bottom of any email you receive.

By mail – Labcold Limited, Cherrywood, Chineham Park, Basingstoke, Hampshire, RG27 8WF

By email – sales@labcold.com or marketing@labcold.com

By telephone – 01256 705570

Automated decision making/profiling

Credit Checks

We use technology provided by the credit reference agency Dun & Bradstreet ("CRAs") that processes primarily business information but may present personal information such as Company Director's names, only as legally allowed, in order to analyse your creditworthiness, which helps us to decide if we are able to offer you an account, through which you can purchase products and services from Labcold Limited.

Dun & Bradstreet also provides further information in its privacy policy about how it processes personal information, which is available on its website: www.dnb.co.uk

Google

We do not use Google marketing services to place advertisements or to build personal profiles, we do use Google service to monitor traffic on our website. You can find out more about how your personal information may be used in connection with Google's advertising functions and options for opting out here: www.google.co.uk/intl/en/policies/technologies/ads

Legal basis for processing

In terms of the legal bases we rely on to process your personal information, these are as follows:

Where you have provided your consent: for direct marketing communications in respect of our own products and services, including in respect of marketing communications sent by electronic means (e.g. email)

For the performance of a contract with you (such as a contract for the provision of good and services) or to take steps at your request prior to entering into this contract

To comply with legal obligations, including in relation to MDR, health and safety and environmental legislation, performing anti- money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation

Under ISO 9001 2015 and MDR we have a legal obligation to gather feedback data for the purposes of post market surveillance.

For our legitimate interests in:

Management of your account (including processing payments) and our relationship with you, and communicating with you

Sending direct marketing in respect of our own products and services where you have not provided your consent and the marketing communication is sent by non-electronic means (e.g. post or telephone)

Processing orders and supplying our products and services

Our internal business purposes which may include processing for the purposes of: record keeping, research, reporting and statistics, data security, to ensure the quality of our products and services, investigating and responding to queries and complaints, obtaining credit references and credit checks, debt collection, fraud detection and prevention, risk management, recruitment and training of our personnel, and protecting our rights, property and safety (and that of others).

You can object to processing carried out on the basis of our legitimate interests at any time. See “Your Rights – The right to object”.

How we share your personal information

We share your personal information for the following purposes:

Third party provider(s) who provide the following types of services to us: warehousing and logistics.

Third party providers in order for us to process payments that are due to us, in doing so we provide bank card details to such providers

Third party providers we appoint as our sales distribution agents, or Service agents, who are provided with access to certain Labcold Limited customer account details in order to complete contractual requirements on our behalf

Our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice

Emergency services in the event that we need to report accidents or incidents or request emergency assistance;

Any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety; or in order to protect the rights, property, or safety of Labcold Limited, its employees or others

Investors and other relevant third parties in in the event of an actual or potential sale or other corporate transaction related to Labcold Limited

Any other third parties, if authorised by you to do so.

We ensure that, where your personal information is transferred to any country outside the European Economic Area this is done using “model clauses” (standard contractual clauses which have been approved by the European Commission as providing adequate safeguards to enable personal data to be transferred outside the European Economic Area) or other specific legally-approved safeguards.

The performance of services by our third party service provider(s) may be subject to a separate privacy statement provided to you by the relevant third party. This can be provided on request and you should read any such statement carefully.

How long we keep your personal information

We retain your personal information for no longer than is necessary for the purposes for which the personal information is collected. When determining the relevant retention periods, we will take into account factors including:

Legal obligation(s) under applicable law to retain data for a certain period of time in line with our regulatory requirements

Statute of limitations under applicable law(s)

(Potential) disputes

Guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

Cookies

Where you use our Website, we will process your personal information collected by using cookies in accordance with our Cookie Policy. For more information on the use of cookies on our Website please go to our Cookies Policy

Links to third party websites

Our Website contains links to other Internet websites. Unless otherwise explicitly stated, we are not responsible for the privacy practices or the content of such websites, including such sites’ use of any personal information.

Nevertheless, in the event you encounter any third party associated with our Website (or who claims association with our Website) who you feel is improperly collecting or using information about you, please contact us.

If and when we sponsor promotions, or third parties sponsor promotions in conjunction with our Website, either the third party or ourselves will post relevant privacy information in the official rules and/or registration area for the promotion. That privacy information, to the extent (if any) it conflicts with this Privacy Statement, will govern that particular promotion.

Security

We use reasonable security methods to protect the personal information that we process, including Internet standard encryption technology (SSL or Secure Socket Layer technology) to encode personal information that you send to us through our Website. SSL works by using a private key to encrypt data that's transferred over the SSL connection. Our entire website is HTTPS (Hyper Text Transfer Protocol Secure) and you will see the green padlock displayed in the browser address bar. However, please note that whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, no transmission over the Internet can be guaranteed to be secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer to us over the Internet.

Your rights

The following section explains your rights. The various rights are not absolute and each is subject to certain exceptions or qualifications. We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. This is why we're providing you with the information in this Privacy Statement.

The right of access

You have the right to obtain a copy of your personal information (if we're processing it), and other certain information (similar to that provided in this Privacy Statement) about how it is used. This is so you're aware and can check that we're using your personal information in accordance with data protection law. We can refuse to provide information where to do so may reveal personal information about another person or would otherwise negatively impact another person's rights.

The right to rectification

You can ask us to take reasonable measures to correct your personal information if it's inaccurate or incomplete

The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal information where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use the information in defence of a legal claim.

The right to restrict processing

You have rights to 'block' or suppress further use of your personal information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your personal information, but may not use it further. We keep lists of people who have asked for further use of their personal information to be 'blocked' to make sure the restriction is respected in future.

The right to data portability

You have rights to obtain and reuse certain personal information for your own purposes across different organisations. This enables you to move, copy or transfer your personal information easily between our IT systems and theirs (or directly to yourself) safely and securely, without affecting its usability. This only applies to your personal information that you have provided to us that we are processing with your consent or to perform a contract to which you are a party to (such as pay and compensation services), which is being processed by automated means.

The right to object

You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time insofar as that processing takes place for the purposes of legitimate interests pursued by BOC or by a third party. We will be allowed to continue to process the personal information if we can demonstrate “compelling legitimate grounds for the processing which override [your] interests, rights and freedoms” or we need this for the establishment, exercise or defence of legal claims.

Rights in relation to automated decision making and profiling

You have the right not to be subject to a decision based solely on automated processing (including profiling), which significantly affects you, subject to some exceptions. Where this is the case, you have the right to obtain human intervention, voice your concerns and to have the decision reviewed.

Contact us

For further information regarding these rights, about this Privacy Statement generally or to make a complaint please contact our Data Protection Officer at human.resources@labcold.com or call us on 01256 705555, please provide as much information as possible to help us identify the information you are requesting, the action you are wanting us to take and why you believe this action should be taken.

Before assessing your request, we may request additional information in order to identify you. If you do not provide the requested information and, as a result we are not in a position to identify you, we may refuse to action your request.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if this is necessary taking into account the complexity and number of requests that you have submitted.

We will not charge you for such communications or actions we take, unless you request additional copies of your personal data undergoing processing, in which case we may charge for our reasonable administrative costs, or you submit manifestly unfounded or excessive requests, in particular because of their repetitive character, in which case we may either: (a) charge for our reasonable administrative costs; or (b) refuse to act on the request.

If after contacting Labcold limited you are still unhappy you may also complain to the Information Commissioner, all contact details are available on the Information Commissioner’s Website: ico.org.uk

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.