

Venn Place Goonvean Business Park Cullompton, Devon, EX15 1UY, UK Tel: +44 (0)1884 777000

**Goonvean Fibres Ltd,** Privacy Policy describes how the company collects, uses, shares and retains personal information that you provide to us. This privacy notice is written in accordance with current Data Protection Laws.

### Collection of Personal Information.

### **Customers:**

As a customer of Goonvean Fibres Ltd, you provide us with limited personal information that makes you identifiable as an individual such as your email address, full name and business or home address. We may also request that you provide us with voluntary information, such as your phone number or industry sector. By providing this information to us you consent to us keeping in contact with your organisation to ensure we are providing the most appropriate products and services in line with your business goals.

## **Suppliers:**

As a supplier of services and/or products to Goonvean Fibres Ltd, we are required to collect any appropriate contact details when products or services have been purchased from yourselves. This information includes email addresses, full name, business address and telephone number. We are required to keep this information by law to ensure if there are any issues in the future with any of the products or services provided to us, we have a point of contact to resolve these.

#### **Events & Conferences:**

Goonvean Fibres Ltd may collect information from you at an event, exhibition or conference in line with the data collection policies laid out in this document and will be used by our team to determine what product or service will be most useful to you.

Online Enquiries: Any information you provide to us via our website, will be automatically collected within the Content Management System applied on the website at that time. This information is automatically transmitted to our email system as the CMS automatically sends notification emails.

b) Automatic Collection of Data: We may automatically collect data about you when you use any of our Sites or our services. For example, if you access the Website via a computer, this information and what browser type you are accessing the Site on will automatically be collected to ensure you are provided with the best user experience on our website. Similarly, with mobile devices, our Site will recognise when a mobile device has accessed the site to alter layouts making the user experience ideal for a smaller screened device.

Information that may be collected by cookies when you use the Sites may include, without limitation:

- the pages you visit within the Sites;
- o the date and time of your visit to the Sites;
- the amount of time you spend using the Sites;

- the Internet Protocol (IP) address used to connect your computer to the Internet;
  and/or
- your computer and connection information such as your browser type and version, operating system and platform.

This information is collected to improve user experience on the Site and you can reject the use of cookies in your web browser settings. We will not associate any personal information we hold on our Servers with any web information that is automatically collected.

Automatic Third-Party Data Collection & Processing Services: Goonvean Fibres Ltd utilise third party analytics software including Google Analytics. These Analytics Tools may use cookies to collect information about the content you view, and your system information and geographic information. The information generated by these cookies about your use of the Sites will be transmitted to and stored by the applicable analytics services. The information collected by these analytics services allows us to analyse your use of the Sites. The Analytics Tools may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf. You may refuse the use of cookies by selecting the appropriate settings in your web browser, however, please note that if you do this you may not be able to use the full functionality of the Sites. By using the Sites, you consent to the processing of data about you by Google in the manner and for the purposes set out above. You can opt-out of Google Analytics by installing Google's opt-out browser add-on, and out of interest-based Google ads using Google's Ads Settings.

Any information posted on our Sites is public, however we do not associate any information regarding comments or reviews on the website with an individual but the business as a whole. Goonvean Fibres Ltd will occasionally send you a customer satisfaction survey

# Using, Sharing & Retention of Data

Except as set forth in this Privacy Notice or when specifically agreed to by you, we will not disclose personal information we gather from you to third parties unless Goonvean Fibres Ltd are required to share this information to complete your request or for legitimate business purposes. For example, delivery details including your contact, your company contact or your employee contact details.

Goonvean Fibres Ltd uses personal information for the purposes stated at the time of collection; to provide advice, products and services to you as a customer, for example to process an order you have placed with us. Goonvean Fibres Ltd also uses your information, as permitted by law to keep you updated on company news, our products and services to ensure you are receiving the best products for your application.

Goonvean Fibres Ltd will only share your information when it is required to, for example if a court order or government request occurs and states that it requires specific information. To the extent permitted by law, if the above occurs, we will disclose your information to government authorities or third parties if: (a) required to do so by law or regulation, or in response to a subpoena or court order or any other enforceable governmental request or order; (b) we believe in our sole discretion that disclosure is reasonably necessary to protect against fraud, to protect the property or other rights of us or other users, third parties or the public at large; or (c) we believe that you have abused the Sites by using them to attack other systems or to gain unauthorized access to any other system, to engage in spamming or otherwise to violate applicable laws. You should be aware that, following disclosure to any third party, your information may be accessible by others to the extent permitted or required by applicable law.

# Legal basis for processing of personal information

If you reside within the European Economic Area (EEA), our processing of your personal information will be legitimized as follows: Whenever we require your consent for the processing of your personal information such processing will be justified pursuant to Article 6(1) lit. (a) of the General Data Protection Regulation (EU) 2016/679 ("GDPR"). This article in the GDPR describes when processing can be done lawfully. If the processing of your personal data is necessary for the performance of a contract between you and Goonvean Fibres Ltd or for taking any pre-contractual steps upon your request, such processing will be based on GDPR Article 6(1) lit. (b)."). If this data is not processed, Goonvean Fibres Ltd will not be able to execute the contract with you.

Where the processing is necessary for us to comply with a legal obligation, we will process your information on basis of GDPR Article 6(1) lit. (c), for example complying in the fields of employment law. And where the processing is necessary for the purposes of Goonvean Fibres Ltd.'s legitimate interests, such processing will be made in accordance with GDPR Article 6(1) lit. (f), for example to detect fraud.

# **Marketing Purposes**

Goonvean Fibres Ltd may email you from time to time with relevant information regarding products or services that we believe may be of interest to you.

# **Transferring Data:**

We may be required to transfer your data to a third party that is not based within the European Economic Area. In such circumstances, we will contact you prior to doing so to confirm that you are happy for us to transfer such data in a secure and relevant way. Transferring of data in this way is a rarity unless it is for law enforcement, or it is to a supplier that may require your assistance.

## Data Retention:

Goonvean Fibres Ltd will only retain your data for as long as it feels is necessary. However, there is certain information we must keep on file as required by law, for example – we are required to keep a record of payments for a minimum of 6 years according to current UK tax laws. If you have any questions about how long, we hold specific types of data don't hesitate to contact us

# **Data Subject Rights**

As a data subject under the current Data Protection laws that are in place you can ask us to remove your personal data from our databases and anonymise you as an individual. You can also request to view what data we hold on our system about you as an individual. Where technically possible we will respond to these requests as soon as possible.

# **Security of Your Information**

Your data is kept on a secure server network within Goonvean Fibres Ltd. There are all relevant security measures put in place to ensure that your data is held safely. These may include certain procedures, physical or technological protection and may include encryption of data or asking you for proof of identity before we disclose your personal information to yourself. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## **Data Storage and Retention**

Goonvean Fibres Ltd will only retain information for as long as it deems fit for business purposes. We deem it necessary to keep all company information regarding transactions, payment etc. For example, if a company merges with another company and becomes a new entity we will keep that information on our database to relate back to previous orders or communications.

## Modification of this Privacy Notice

From time to time, Goonvean Fibres Ltd may need to make alterations to this privacy policy in line with business practices, data collection practices or organisation. We reserve the right to amend, without any notice to you, at any time and for any reason we deem necessary. It is strongly recommended to check the Site often, we will in any case not reduce your rights under this Privacy Notice without your explicit and informed consent. If you do not agree to the changes, you should discontinue your use of the Sites, and cease providing personal information to us, prior to the time the modified Privacy Notice takes effect. If you continue using the Sites or provide personal information after the modified Privacy Notice takes effect, you will be bound by the modified Privacy Notice.

# Questions, Concerns or Complaints

Questions regarding this Privacy Notice should be directed to Goonvean Fibres. To help us keep your personal information up to date, or to request access to the personal information Goonvean Fibres Ltd maintains about you, please contact us at:

Goonvean Fibres Ltd, Venn Place, Goonvean Business Park, Cullompton, Devon, EX15 1UY, UK

Goonvean Privacy contact - Debbie Key dkey@goonveanfibres.co.uk