

INTRODUCTION

Proact respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data including when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Proact collects and processes your personal data including through your use of our website, and including any data you may provide to us when accessing or subscribing for reference material, newsletters, purchasing products or services, participating in events, or interacting with tools or applications provided by us.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements such other notices and is not intended to override them.

CONTACT DETAILS

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer by email at dpo@proact.eu.

You have the right to make a complaint at any time to the supervisory authority in your jurisdiction for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance – should this not be possible, details of the supervisory authorities can be found at <https://www.proact.eu/en/supervisory-authorities-list/>.

DATA CONTROLLER

Proact is made up of different legal entities, details of which can be found here <https://www.proact.eu/en/contact-us>. This privacy notice is issued on behalf of the Proact corporate group so when we mention "Proact", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Proact corporate group responsible for processing your data. The relevant company is the company which provided you with the link to this privacy notice.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 22nd May 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may use any information you provide to us as set out in this privacy notice.

We may also collect personal data about you from third parties including publicly available information sources (including social media and websites), third party marketing agencies, vendors and our customers or suppliers which may also be used by us as set out in this privacy notice.

The personal data may include identity data, contact information, financial details, details of your transactions with Proact or related parties, technical data deriving from your use of our website or products and services, profile and usage data from our services which you access, and marketing and communications interests and preferences. We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does 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 notice.

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.

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 or your organisation (if this is our customer) has with us; but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

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

- Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - enter into discussions to provide us with your products or services;
 - use or interact with the services on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy http://www.proact.eu/About_us/Cookie-Policy1/ for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources based inside or outside the EU and the UK as set out below:
 - technical data from the following parties:
 - analytics providers such as Google;
 - advertising networks; and
 - search information providers.
 - contact, financial and transaction data from providers of technical, payment, credit reference and delivery services.
 - identity and contact data from data brokers or aggregators.
 - identity and contact data from publicly available sources.

4. HOW WE USE YOUR PERSONAL DATA

PROCESSING PURPOSES

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

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

- To register you or your organisation as a new customer or supplier;
- Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our customers or suppliers;
- To use data analytics to improve our website, products/services, marketing, customer or supplier relationships and experiences;
- To identify and prevent fraud;
- To improve customer service;
- To deliver goods or services to you or your organisation;
- To process invoices for goods or services delivered by you or your organisation to us or our customers;
- To personalise user experience;
- To enhance the security of our network and information systems;
- To better understand how people interact with our websites;
- To contact you by telephone with communications we think may be of interest to you;
- To provide postal communications which we think will be of interest to you;
- To send periodic emails containing information that will be of interest to you;
- To determine the effectiveness of promotional campaigns and advertising;
- To provide to our suppliers, vendors and/or subcontractors in order to deliver our products and services or for you to be invited to participate in events which we think will be of interest to you; and
- To manage our relationship with you which will include:
 - Notifying you about changes to our terms or privacy policy
 - Asking you to leave a review or take a survey.

LEGAL BASES

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 or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

OUR LEGITIMATE INTERESTS

- to recover debts due to us;
- to keep our records updated;
- to manage supplier relationships;
- to study how customers use our products/services;
- to develop our products/services;
- to grow our business;
- for running our business, provision of administration and IT services;
- for network security;
- to prevent fraud;
- in the context of a business reorganisation or group restructuring exercise;
- to inform our marketing strategy;
- to define types of customers for our products and services; and
- to keep our website updated and relevant.

MARKETING / OPTING OUT

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

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Please be aware that we use a tracking system to monitor your activity when you access Proact marketing and advertising material, for example our Proact newsletter. This must therefore be borne in mind when accessing any Proact material.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see http://www.proact.eu/About_us/Cookie-Policy1/.

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 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. TRANSFERS TO THIRD PARTIES

We share your personal data within the Proact corporate group. This may involve transferring your data outside the EEA.

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

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. 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.

7. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at dpo@proact.eu.

8. YOUR LEGAL RIGHTS

You have a legal right to: request access to and/or rectification or erasure of your personal data; restrict our processing of your personal data; object to our processing of your personal data; the right to data portability; as well as the *to withdraw any consent you have given*.

You can make requests regarding your personal data by contacting our Data Protection Officer at dpo@proact.eu or, if you are an existing customer with access to Proact's self-service portal (support.proact.eu), by completing the forms available in the portal.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.