

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and how to contact us and supervisory authorities.

Italicised words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

Who we are

Kiowa Limited collect, use and is responsible for certain personal data about you. We are required to comply with the *data protection regulations* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

When we mention "Kiowa", we are referring to *Kiowa Limited*.

Kiowa Limited is a company registered in England & Wales (2667552) whose registered office is: c/o Duncan and Toplis, 18 Northgate, Sleaford, NG34 7BY.

We trade in industrial components and services.

The personal data we collect and use

In the course of trading with you we may collect the following personal data when you provide it to us:

Contact information

If you engage with us at trade shows or other events, we may also collect similar information when you express an interest in our goods and services.

If you register on our e-commerce web site, we may gather similar information during the registration process.

Information collected from other sources

We do not collect information about any personal contacts from other sources.

How we use your personal data

All personal data collected is necessary for *our* trade in goods and services. This information may be connected to your employer, such as a business or trading address, and other information necessary to complete the trade of goods and services.

The table below sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third parties linked to that activity
Sales enquiries and order processing	Application for and performance of a contract	Certain trusted suppliers if a direct drop-shipment service is selected and delivery agents to deliver an order or collect returns
Purchase enquiries and order processing	Application for and performance of a contract	Delivery agents, if the agreement stipulates a collection of <i>our</i> order from you
eCommerce facility registration	Consent, Application for and performance of a contract	Payments by card is processed through a secure payment service provider
Training services	Consent, Application for and performance of a contract	Training service provider as specified in the agreement
Marketing	Consent, Legitimate Interest	Email management services

Special category data

We do not collect or process any special category data.

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of *products and services* from us that may be of interest to you. We will only do so where we have obtained your consent and we have a legitimate business reason and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of *products and services* of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences, please contact us:

By phone: 01529 415551

By email: dp@kiowa.co.uk

By Post: Kiowa Limited, The Reservation, East Road,
Sleaford, NG34 7BY, United Kingdom

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of every email.

Whether information has to be provided by you, and if so why

We only collect personal data necessary for us to conduct trade with you. Without this information it may not be possible to trade in goods and services with you.

How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below. Where there is a statutory requirement to retain details, we will retain information to satisfy those obligations.

Type of Record	Retention Period
Trade records, taxation and contacts	7 years
Contracts	3 years after expiration

How we keep your data

Your information is held in our Enterprise Resource Planning system. Some information may also be held on secured cloud servers hosted within the European Economic Area, including our e-mail and e-commerce facilities.

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in

order to comply with *our* legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that we restrict *our* use of your personal data in certain circumstances, for example:

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful, but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data, but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

To contest decisions based on automatic decision making

If a decision has been made about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in *our* decision-making processes to protect your rights and freedoms.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we

have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please contact us:

By email: dp@kiowa.co.uk

By Post: Kiowa Limited, The Reservation, East Road, Sleaford, NG34 7BY, United Kingdom

- let us have enough information to identify you;
- let us have proof of your identity and address; and
- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact *our* data protection representative if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please use:

By email: dp@kiowa.co.uk

By Post: Kiowa Limited, The Reservation, East Road, Sleaford, NG34 7BY, United Kingdom

Glossary of Terms

we, us or our	Kiowa Limited is a company registered in England & Wales (2667552) whose registered office is c/o Duncan and Toplis, 18 Northgate, Sleaford, NG34 7BY.	data protection regulation	applicable data privacy and protection laws
contact information	these are details that can be used to deliver, or provide a quotation for, goods and services, and engage a person or persons connected to these actions, and may include title, first name, surname, telephone number, fax, email address, address, country, postcode or city of residence, or details necessary to use other communication services.	identity information	this is any information that can be used to distinguish a person or verify their identity, including name, date of birth, place of birth, gender, national identity card/number, passport, drivers licence
data controller	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of the trade in <i>goods and services</i> with you	products and services	physical goods in which <i>we</i> trade and actions <i>we</i> provide on behalf of <i>our</i> customers based on agreed terms