



Data Protection

Fair Processing Notice

for non-Employees

Introduction

The purpose of this notice is to give you information about how and why Synthomer processes your Personal Data, as well as your rights in relation to your Personal Data. This notice is relevant to customers and suppliers of Synthomer, as well as users of Synthomer's website and applicants for jobs with Synthomer. Please note that it is not relevant to employees of Synthomer, as our employees can find an appropriate fair processing notice on the Synthomer intranet.

Your Personal Data includes all the information we hold that identifies you or is about you, for example, your name, email address, postal address, date of birth, location data, and in some cases opinions that we document about you.

Everything we do with your Personal Data counts as processing it, including collecting, storing, accessing, using, amending, transferring and deleting it.

Our responsibilities

This notice is issued on behalf of the Synthomer group of companies (other than our Italian entities). When we mention Synthomer, "we", "us" or "our" in this notice, we are referring to the relevant company in the group (other than an Italian group company) which is responsible for processing your data (and therefore the data controller). A list of group companies is available in the final pages of our latest annual report (available [here](#)). If you are a customer or supplier of one of our Italian group companies, you can request a copy of the relevant fair processing notice by emailing info@synthomer.com.

We are required to comply with applicable data protection legislation to make sure that your information is properly protected and used appropriately.

Our Group Legal team oversees issues arising in connection with data protection legislation and requests we receive from individuals exercising their rights under relevant data protection legislation. Our legal team can be contacted about data privacy queries (including requests to unsubscribe from email marketing) by email: GroupLegal@synthomer.com.

Why do we process your Personal Data?

We process your Personal Data in order to fulfil the contract we have entered into with you or your employer, to receive services or goods from you or your employer, to provide the services you or your employer have requested from us, and/or to liaise with you or your employer in a business capacity.

We may also process your Personal Data to respond to any queries or comments you submit to us, including via our website and to consider applications for jobs with Synthomer which you may have submitted to us.

We may need Personal Data from you to be able to enter into a contract with you or your employer and provide you with all the information you need. If we do not receive that Personal Data from you, we may be unable to fulfil our obligations to you or your employer. If you have applied for a job with Synthomer then we need that Personal Data to be able to consider your application.

We process most of your information on the grounds of:

- our legitimate interests (i.e. fulfilling our obligations to you or your employer and liaising with you as required by our relationship with you or your employer, or considering your job application);
- fulfilment of our contract with you or your employer; or
- to comply with a legal obligation.

If none of the grounds above apply, we will obtain separate consent from you to the processing of your Personal Data. You can withdraw your consent at any time (including unsubscribing from email or telephone marketing) by [contacting us](#). This will not affect the lawfulness of any processing we carried out prior to you withdrawing your consent or to any processing which we undertake on another basis (such as legitimate interests).

Who will receive your Personal Data?

We only transfer your Personal Data to a third party or allow a third party to access your Personal Data to the extent we need to.

We may transfer your Personal Data to other Synthomer group companies located both within and outside of the EEA. We will do this on the basis of an intragroup agreement, which includes appropriate safeguards to protect your Personal Data.

Other recipients of your Personal Data may include:

- third party processors providing services to Synthomer, for example: IT and system administration service providers, couriers, professional advisers, credit reference agencies, and sanctions and fraud checking agencies;
- tax authorities, regulatory bodies and other authorities where this is required to fulfil a legal obligation;
- third parties (as data controller) to whom we may choose to sell or transfer parts of our business or our assets, or with whom we may merge. If a change happens to our business, then new owners may use your Personal Data in the same way as set out in this notice.

Some of these third parties may be located outside of the EEA, in which case we will only transfer your Personal Data to them where:

- the country where the third party is located and/or conducts the processing has been found by the EU Commission to have adequate standards for the protection of Personal Data; or
- a data transfer agreement is in place which incorporates the EU model clauses (which ensure that appropriate safeguards will govern the transfer of the data); or
- they are based in the United States of America (USA) and the third party is part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between Europe and the USA.

How long will we keep your Personal Data?

We will retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, or, if longer, in order to fulfil any legal, accounting or reporting requirements. In many cases this is likely to be for up to seven years after you or your employer cease being a customer or a supplier, particularly where your Personal Data is included in documents which relate to transactions between your company and a Synthomer group company.

To determine the appropriate retention period for each category of 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 any relevant legal requirements.

Details of the retention periods for different categories of Personal Data are available in our retention schedule which you can request by [contacting us](#).

What are your rights?

You have a number of rights in respect of the Personal Data we hold about you. We have summarised your rights below, and more information is available from the Information Commissioner's Office website ([link here](#)) or from the websites of other EU supervisory authorities for data protection. These rights apply for the period during which we process your data.

1. Access to your data

You have the right to ask us to confirm that we process your personal data, as well as to request access to or copies of your personal data. You can also ask us to provide a range of information, although most of that information is already contained in this fair processing notice.

In the EU, we will provide the information free of charge unless your request is manifestly unfounded or excessive or repetitive, in which case we are entitled to charge a reasonable fee. We may also charge you if you request more than one copy of the same information. In other countries, we may charge a fee if this is permitted by local data protection legislation.

We will provide the information you request as soon as possible and in any event within one month of receiving your request unless an extension of time is required and permitted. If the timeframe for responding set out by law is shorter in non-EU countries, we will respond within the relevant timeframe. If we need more information to comply with your request, we will let you know.

2. Rectification of your data

If you believe Personal Data we hold about you is inaccurate or incomplete, you can ask us to rectify that information. We will comply with your request within one month of receiving it, unless we do not feel it is appropriate in which case we will let you know why. If the timeframe for responding set out by law is shorter in non-EU countries, we will respond within the relevant timeframe. We will also let you know if we need more time to comply with your request.

3. Right to be forgotten

In some circumstances, you have the right to ask us to delete Personal Data we hold about you. This right is available to you:

- where we no longer need your Personal Data for the purpose for which we collected it;

- where we have collected your Personal Data on the grounds of consent and you withdraw that consent;
- where you object to the processing and we do not have any overriding legitimate interests to continuing processing the data;
- where we have unlawfully processed your Personal Data (i.e. we have failed to comply with the relevant data protection legislation); and
- where the Personal Data has to be deleted to comply with a legal obligation.

There are certain scenarios in which we are entitled to refuse to comply with a request to delete your Personal Data. If any of those scenarios apply, we will let you know.

4. Right to restrict processing

In some circumstances you are entitled to ask us to suppress processing of your Personal Data. This means we will stop actively processing your Personal Data but we do not have to delete it. This right is available to you:

- if you believe the Personal Data we hold is not accurate – we will cease processing it until we can verify its accuracy;
- if you have objected to us processing the data – we will cease processing it until we have determined whether our legitimate interests override your objection;
- if the processing is unlawful; or
- if we no longer need the data but you would like us to keep it because you need it to establish, exercise or defend a legal claim.

5. Data portability

You have the right to ask us to provide your Personal Data in a structured, commonly used and machine-readable format so that you are able to transmit the Personal Data to another data controller. This right only applies to Personal Data you provide to us:

- where processing is based on your consent or for performance of a contract (i.e. the right does not apply if we process your Personal Data on the grounds of legitimate interests); and
- where we carry out the processing by automated means.

We will respond to your request for portable Personal Data as soon as possible and in any event within one month from the date we receive it, unless an extension of time is required and permitted. If the timeframe for responding set out by law is shorter in non-EU countries, we will respond within the relevant timeframe. If we need more time, we will let you know.

6. Right to object

You are entitled to object to us processing your Personal Data:

- if the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority;
- for direct marketing purposes (including profiling) (i.e. you can request to unsubscribe); and/or
- for the purposes of scientific or historical research and statistics.

In order to object, you must have grounds for doing so based on your particular situation. We will stop processing your data unless we can demonstrate that there are compelling legitimate grounds which override your interests, rights and freedoms or the processing is for the establishment, exercise or defence of legal claims.

Automated decision making

Automated decision making means making a decision solely by automated means without any human involvement. This would include, for example, an online credit reference check that makes a decision based on information you input without any human involvement.

We do not carry out any automated decision making using your Personal Data.

Your right to complain about our processing

If you think we have processed your Personal Data unlawfully or that we have not complied with relevant data protection legislation, you can report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("ICO"). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website - <https://ico.org.uk/concerns/>.

Any questions?

If you have any questions or would like more information about the ways in which we process your data, please contact GroupLegal@synthomer.com.