

## Gateway Electronic Components Limited Privacy Policy 2018

Gateway Electronic Components Ltd respects personal rights to privacy and has adopted a policy that complies with the appropriate general data protection regulations. The policy is reviewed at board level on an annual basis and may be modified as part of our continuous improvement programme.

This policy outlines how we collect, store, and utilise any personal data we collect about you or from you. The collection of personal data is done to enable us to fulfil orders we receive or to notify you of important information about an order status, a product, a shipment, an appointment, a service, a change to trading terms and any other matter which we deem to be of importance in our trading relationship. In some cases, it may be important for us to hold this personal data to comply with our legal and taxation responsibilities.

For people that are either applying for employment or are employed by the company we may hold personal data about you in our personnel files to fulfil our HR duties and Taxation obligations. Data on unsuccessful candidates will be destroyed once the position has been filled.

We understand that you have a choice to have access to your personal data held by us, and also the right to modify, correct, update, de-activate or delete your personal data from our records.

### **How might we collect your personal data?**

When processing quotations and orders via our sales routine, either online, by email or by phone, we will need to record personal data to ensure we are able to fulfil your order needs correctly. In some instances, this personal data is necessary for us to comply with legal and financial responsibilities and where this is the case we may not be able to process your order instructions without this data.

During any online session with any of our websites we will collect information about your IP (Internet Protocol) address and log-in information. We make use of software packages to assess the suitability of our site functionality and the user experience when using the system. The software collects non-personal information about the site's visitors: activity statistics, accessed files, paths through the site, information about referring pages, search engines, browsers, and operating systems. The data generated from the software is only analysed in a consolidated general format and is not shared with any third party. We are happy to share with you any information about the web access analysis software that we use.

In our online trading environment, you may be required to enter information into data fields which will be fully encrypted to protect the security of your data.

The information you may be required to give us might include your name, address, email contact details, telephone numbers, financial and credit/debit card information, details of your company's activities and the products that may be of interest to you to complement other items that you are specifically interested in.

You may give us information by filling in forms on our websites or by sending us relevant content in correspondence to our company. Should you choose to participate in social media discussion activity or respond to blog articles we may collect relevant data from you.

Should you make an application for employment within the company we may require you to submit a copy of your curriculum vitae as well as completing an application form. This data could be transmitted to us in printed form or via the internet. It may be held by us in printed or electronic format in locked or password protected secure environments under control of the HR function of the company. The information provided by unsuccessful candidates will be destroyed upon placement of the role.

### **How we might use the information we collect.**

To enable us to honour our commitments to meet any contracted requirements for products and services.

To enable us to contact you to update you on the status of any orders for products and services.

To notify you of tracking information of shipments that have left our warehouse.

To carry out customer audits to support our ISO QA procedures, to obtain feedback on our service levels

To notify you about changes to our terms and conditions; to update you on product change notification (PCN) information; to inform you of changes to personnel or dedicated contacts responsible for your account.

To communicate with you any relevant information to enable you to liaise with colleagues within your organisation to better support our service to you, including credits status update, orderbook status and expediting, technical support and product advice.

Engage with you to help us to improve the range of services that are available directly from the company and from the various web-based trading portals that the company operates.

To enable us to update you on changes to the company's structure, franchise base, product portfolio and associated services so that you are able to assess the suitability of the company to support your needs.

To help determine your suitability in filling a vacancy of employment within the company.

### **Our marketing contact database.**

The company is constantly modifying the range of franchises, products and services that its customers make seek to take benefit from, and so that you can be updated when this happens we maintain a marketing contacts database for both overland mail and email.

Additionally, we run promotional campaigns on a regular basis; attend exhibitions and trade shows; produce updated printed catalogues for mail-out; and run occasional competitions, all of which we like to publicize.

You may opt-out of receiving any marketing communications, and any instruction received over the phone, by email or by using the unsubscribe facility on marketing emails will be actioned within 24 hours of receipt. However, to fulfil our other non-marketing obligations to you we may need to retain your details on our system to maintain our legal obligations.

### **Storage of personal data.**

All information that we hold is stored on our secure and fully encrypted servers. All transactions on any of our trading sites are protected with up to 256-bit Secure Sockets Layer (SSL) encryption. SSL certificates can be viewed by accessing the links on our websites.

Access to your account on our websites is password protected, using a password of your construction. The company accepts no liability for third party detection and misuse of a registered user's password as a result of negligence by the user.

### **Data retention, opting out and deletion – your rights.**

As part of our quality system we retain certain pieces of information such as purchase orders, for up to 13years to allow us to fulfil our traceability standards. Once these items are dated the paperwork relating to them is destroyed in a certified way onsite.

In compliance with general data protection regulations we will delete any or all of your personal data on our records on receipt of an explicit instruction, so long that this does not contravene our legal responsibilities. This may be made using the contact us link on all of our websites or by emailing [marketing@gatewaycando.com](mailto:marketing@gatewaycando.com).

You have the right to review and update your registered account details by signing in to your account at any time, where applicable.

You have the right at any time to access, correct, modify or delete any information held about you. You have the right to object to us processing your personal information if we are not entitled to use it any more or have its processing restricted in certain circumstances. Please contact us through the [marketing@gatewaycando.com](mailto:marketing@gatewaycando.com) if you wish to exercise these rights. We may have to request proof of identity before we disclose information to you.

You can request a copy of the personal information we hold about you at any time. If you wish to do so, please contact [marketing@gatewaycando.com](mailto:marketing@gatewaycando.com). Please be advised that we will not charge you for this service, but our security procedures mean that we will have to request proof of identity before we disclose information to you.

We appreciate that customer contacts may change over time and we may not have been advised of changes to contact details, please advise us of any errors at [marketing@gatewaycando.com](mailto:marketing@gatewaycando.com) and we will correct our database.

**Contact us.**

We welcome your comments, observations and requests. Please direct these through [marketing@gatewaydcando.com](mailto:marketing@gatewaydcando.com) or write to us at:

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