

Zotefoams plc		
INFORMATION SECURITY	Doc Ref	IS028
VISITORS PRIVACY POLICY	Issue	1
	Rev	0

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Introduction

Welcome to Zotefoams' Visitors Privacy Policy ("this privacy policy").

Zotefoams respects your privacy and is committed to protecting your personal data. This privacy policy will inform you about how the personal information we collect about you, either from yourself or others, will be handled and protected by Zotefoams; and will tell you about your privacy rights and how the law protects you.

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1. Important information and who we are Purpose of this privacy policy

This privacy policy aims to give you information on how Zotefoams collects and processes your personal data during and after your visit to our offices, being the information about yourself which you provide when you register at reception.

This privacy policy is not directed to children, and we do not knowingly collect data relating to children in relation to the processing covered by it.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

Controller

Zotefoams plc is the controller responsible for your personal data (collectively referred to as "Zotefoams", "we", "us" or "our" in this privacy policy).

We have appointed a Data Protection Compliance Manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, please email mcr@zotefoams.com. If you have questions about our privacy practices more generally, including any requests to exercise your legal rights, please contact our Data Protection Compliance Manager using the details set out below.

Contact details

Name of Data Protection Compliance Manager: Michael Richards.

Full name of legal entity: Zotefoams PLC.

Email address: mcr@zotefoams.com

Postal address: Zotefoams PLC. 675 Mitcham Road, Croydon, CR9 3AL. UNITED KINGDOM.

Telephone number: 020 8664 1600

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

This privacy policy was last updated in November 2023. We keep our privacy policy under regular review and may amend this privacy policy from time to time to keep it up to date or to comply with legal requirements. You should regularly check this privacy policy published on the Zotefoams website for updates.

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 the period we keep your data.

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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 completely removed (anonymous data).

We will collect, use, store and transfer different kinds of personal data about you which may be grouped together as follows:

- **Identity Data** means your first name and last name, and vehicle registration number which you enter onto our online visitor registration portal at the reception desk
- **Contact Data** means the telephone number you give us when you register.

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. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use the following method to collect data from and about you:

- **Direct interaction.** You give us your Identity and Contact Data specified above. This is the personal data you provide when you enter your details onto our online visitor registration portal at the start of your visit.

4. How we use your personal data

We will only use your personal data when the law allows us to. We will use your personal data in the following circumstance: where we need to comply with a legal obligation to keep a record of the people on our premises for the purposes of health and safety legislation.

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5. Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we use your personal data, and the legal basis we rely on to do so.

Purpose/Activity	Types of personal data	Types of special category personal data	Lawful bases for processing (reference is to Article in UK GDPR) including basis of legitimate interest
Keeping a record of people on site in case we need to evacuate the site because of fire or other emergency	Identity Data; Contact Data	None	Article 6(1)(c)

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, in which case we will add that additional compatible purpose to this privacy policy as soon as reasonably practicable. 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. If you wish to get more information as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Protection Compliance Manager.

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.

6. Disclosures of your personal data

We may share your personal data with the parties set out below for the purpose set out in the table in section 5 above on **Purposes for which we will use your personal data** above.

- Internal Third Parties as set out in the **Glossary**.
- External Third Parties as set out in the **Glossary**.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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. We do not disclose applicant information to job banks, or to other companies outside the Zotefoams Group or external third parties not listed in the **Glossary**.

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7. International transfers

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring the following safeguard is implemented:

We transfer your personal data to the following country that has been deemed to provide an adequate level of protection for personal data: France.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

8. 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. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know the specific information in question in order to carry out their responsibilities with regard to contract, employment or other law. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have also 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.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the above purpose we collected it for, namely in relation to your visit, including for the purposes of satisfying any legal, regulatory, or reporting requirements. If you would like to know Zotefoams' specific retention period for a type of your personal data involved in a particular process, please contact our Data Protection Compliance Manager. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

When we no longer need your personal data, we will dispose of or minimise the personal data in accordance with approved company processes to ensure all reasonable efforts and precautions are taken to protect the confidentiality of the data.

In some circumstances you can ask us to delete your data: see section 10 on **Your legal rights** below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

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10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, except for direct marketing, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not usually 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 could 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 could 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.

11. Glossary

LAWFUL BASIS

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

None.

External Third Parties

- Our Croydon online visitor registration portal provider, Kelio SAS.