



PRIVACY POLICY

1 OUR DETAILS

SolutionsPT Limited ("we", "us" and "our") are committed to protecting and respecting your privacy.

Any reference to "we" or "us" or "SolutionsPT" means SolutionsPT Limited, which is a private limited company with registered company number 1937672. Our registered office address is Unit 1 Oakfield Road, Cheadle Royal Business Park, Cheadle SK8 3GX.

This Privacy Policy is relevant to you if you are or work for a customer or a prospective customer, or supplier to SolutionsPT and/or are a visitor to <u>www.solutionspt.com</u>, <u>www.wonderware.co.uk</u> or <u>www.wonderware.ie</u> (our "Sites").

This Privacy Policy (together with our <u>Website Terms of Use</u>, <u>http://wonderware.co.uk/;</u> <u>http://www.wonderware.ie/</u>, our <u>Cookies Policy</u> and any other documents referred to in them) sets out the basis on which we collect information from you and how we use information which we collect or which you provide to us. This includes information which we collect or that you provide via our Sites.

If you have any questions regarding how we use your information or you wish to exercise any of your rights set out below or in paragraph 7 below, please contact us at <u>info@solutionspt.com</u> or by writing to Neil Pearce, Commercial Manager at our registered office address of Unit 1 Oakfield Road, Cheadle Royal Business Park, Cheadle SK8 3GX.

2 WHAT INFORMATION DO WE COLLECT AND WHEN?

We only collect information that we will use for the purposes set out in this notice.

Specifically, we collect:

- Information you submit to us:
 - o Through forms, for example by filling in our 'Contact Us' form on our Sites;
 - By sending us emails and text messages;



- By adding posts, reviews and other comments to our Sites or to our Twitter accounts (@wonderwareUK or @solutionsPT);
- By speaking to us in person or over the telephone, for example in making an enquiry or a complaint about a product or service you have purchased;
- By applying for or registering accounts with us, either as a supplier or a customer. This includes setting up passwords and preferred user names, contact details, account details, your preferences and interests; and
- By applying for a job with us or registering your interest in doing so, either directly with us or via a third party recruitment agent.

Please note: If you submit details to us of any other person (e.g. a colleague), please make sure you have their permission before doing so.

In the event that you send us hardware or where we access your systems remotely, you should be aware that we may need to access personal data contained on such hardware or systems in the provision of our services to you. In such circumstances we will try to minimise access to such personal data where appropriate and will take appropriate technological and security measures to protect the personal data whilst we are accessing it. Please ensure, however, that you inform any third parties whose personal information you store that we have access to such data in accordance with your data governance obligations.

- Information we collect about you
 - **Identification information about you,** including your name, contact details, job title, company name and SI accreditation level.
 - Full details of the purchases you make from us, including the time and date of purchase, the products and services you purchase from us, any relevant delivery address(es) and details of any relevant payment cards or bank account details.
 - Full details of the purchases we make from you, including the time and date of purchase, the products and services we purchase from you and any other details relevant to the purchase such as the name and contact details of salesperson.
 - Information on what you search for, view, click on and access in and through our Sites and our marketing communications. We do this through the use of cookies. Our <u>Cookies Policy</u> gives you more detailed information on how we use cookies and the information we collect. This includes information on how to manage cookies.
 - Technical information about the devices you use to access our Sites. We collect each device's unique identifying code (MAC address), relevant IP



address, operating system and version, web browser and version, and geographic location.

- CCTV images This information may include images of you from CCTV cameras installed externally and internally at our sites. We use this information for the purposes of public safety and the prevention of fraud and other criminal activity.
- Information from banking, credit card and credit reference agencies about your financial status and the status of any payment card presented to us (for example, if it has been reported stolen) to check we are likely to be paid for any transaction and to reduce the risk of fraud.
- Information about you for the purposes of processing your job application or registering your interest in a job with us. This includes including your name, contact details (i.e. address, home and mobile phone numbers, email address), details of your job application (including the application itself, your qualifications, experience and references and employment history, including details of current salary and benefits).

3 HOW DO WE USE YOUR INFORMATION?

We use the information we collect for the following purposes:

- **To provide you with our Sites**, which requires a certain amount of technical information to be collected in order to work properly.
- To power security measures and related services relating to your access to our Sites for example to enable us to recognise your username and password for your account and reset these if you forget them.
- To enable you to order products and services from us both via our sales team and on our Sites (including setting up your account), which again requires a certain amount of information to be collected, for example payment card or bank account details so we can take payment for the products you buy so we can provide you with an invoice and receipt.
- To enable us to order products and services from you, which requires a certain amount of information to be collected, for example bank account details so we can make payment for the products and services we buy from you.
- **To gather feedback from you** about our Sites, our products, other services and activities from time to time. We may invite you to provide this feedback on occasion, for example by emailing you to ask if you would like to review a product or service you have bought. We may use independent research and feedback providers to do so on our behalf.
- To contact you from time to time about things you have told us you want to hear about, for example our products, news, offers, new competitions and sponsored events.



- **To respond to any questions, suggestions, issues or complaints** you have raised with us.
- To communicate with you about operational changes to our Sites, our products, services, for example if we were to change this Privacy Policy.
- To perform any contract we have entered into with you but also to enforce a contract against you if you do not honour it, including seeking to collect any debts that you may owe us.
- To gather statistics about how you and other people use our Sites and what you think of our adverts, offers, news, product information, competitions, sponsored events, social media and other digital content. We then analyse these statistics to understand if these things meet most people's needs, or if they should be improved, and if so, what design or other changes (for example, around the nature and timing of communications) would be most beneficial for our customers and our business.
- To check that you have or are likely to have the means to pay us for any products or services you have ordered from us on our Sites or via our sales team.
- To monitor use of our Sites to see if it is being abused or threatened, for example by people posting inappropriate comments in review areas or by potential hackers attempting to undermine our security.
- **To protect you and our business against any other criminal behaviour**, including identity theft and fraud.
- To maintain administrative and legal records about our business to enable us to understand what we have bought and sold, how, when, where and at what price and account to HM Revenue & Customs for the related taxes that we have to pay.
- To enable us and our third party service providers to plan and manage our day-to-day business and related services as effectively as possible, for example in predicting likely sales volumes for each of our products and services, so we can try and make sure we have enough stock and resource to meet likely demand.
- To enable us to understand our customer and user base. We do this by combining your information with information about our other customers and users of our Sites so we can spot trends and common factors. We can then further tailor our business approach and in particular our marketing communications, products and services to the things we think you and other people or businesses like you and your business would be most interested in.
- In the process of anonymising your information so that you are no longer identifiable to us.



- **To test new systems and processes** as we roll them out to make sure they work and will meet the high expectations we set for ourselves.
- To assist us in the development of new products and services over time, for example to gauge whether a new product is likely to appeal to a large proportion of our customer base.

4 LEGAL BASIS FOR USING YOUR INFORMATION

We will only use and process the data you provide to us where we have a lawful basis for doing so.

In accordance with data protection law, we are obliged to inform you that we are using your information as described in this policy on the following legal bases:

- the use is necessary to perform a contract between us or to take steps which you requested us to take before entering into a contract;
- the use is necessary to comply with a legal obligation to which we are subject; or
- the use is necessary for the purposes of legitimate interests, including direct marketing, fraud prevention or preventing crime and protecting public security.

You may not always have to give us the information that we have requested. We will make it clear if certain information we require is mandatory so that we can provide you with our services or so that we can comply with our legal requirements. We will also tell you what the consequences are of not providing us with such information.

5 WHO DO WE SHARE YOUR INFORMATION WITH?

We cannot run our business or provide many of our services and benefits without involving other people and businesses and sometimes we pass your information to these other people and businesses as set out below. We only share your information where we can do so in accordance with our legal data protection and privacy obligations. We share the information we collect with:

- Other people and businesses who help us provide our Sites and related services to you, for example, payment services companies who enable you to use payment cards with us.
- Analytics and search engine providers who assist us in the improvement and optimisation of our Sites.
- Our insurers and insurance brokers where required in order for us to be able to obtain insurance against risks we face in running our business. They may retain this



information for the purpose of ongoing risk assessment and insurance broking and underwriting services.

- Credit reference agencies who provide anti-fraud and credit score information to us, banks and finance companies who also provide anti-fraud services, customer insight companies, and companies to pursue debtors. in each case as necessary in order to benefit from their services. Where we do so for anti-fraud purposes, the recipient organisation may hold your information on file for the purpose of their fraud prevention services in future.
- **Business partners, suppliers and sub-contractors** for the performance of any contract we enter into with them or you.
- The prospective buyer of any part of our business or assets that we may sell.
- **Our professional advisers** for example our lawyers, accountants and technology consultants when they need it to provide advice to us.
- The police, local authorities, HM Revenue & Customs (HMRC), the courts and any other central or local government bodies where they request it and we may lawfully disclose it, for example for the prevention and detection of crime.
- Other people who make a subject access request to us, where we are allowed to do so by law (see Managing Your Information below for what we mean by a subject access request).

We may also share the information we collect where we are legally obliged to do so, for example, to comply with a court order.

6 HOW LONG DO WE KEEP YOUR INFORMATION FOR?

In accordance with our legal data protection and privacy obligations, we will only retain your information for as long as is necessary for the purpose for which it was collected. Where you have not purchased our services or contacted us within the last three years, we will then either securely delete it or anonymise it so that it cannot be linked back to you.

See **How do we use your information?** in paragraph 3 above for full details of those purposes.

7 INTERNATIONAL TRANSFER OF YOUR INFORMATION

We use international suppliers to help ensure you receive the very best products and services from us. Where we do so, we have taken appropriate safeguards to ensure your information will remain protected. We only permit the transfer of your information to a country based outside the European Economic Area if the third party has entered



into Standard Contractual Clauses with us or if there is an alternative legal mechanism for the transfer. Further information can be provided on request. Please use the Contact Us details set out below.

8 MANAGING YOUR INFORMATION

You can contact us to discuss your information at any time using the details provided below.

It is very important to us that all the information we hold about you remains accurate and up to date to reduce the risk of a misunderstanding.

We need your help in doing so. If you have an online account with us, please ensure that the information (for example, contact information) you provide to us through that account remains accurate and up to date. Please review and update it regularly.

You have a number of rights which we respect and aim to uphold in everything we do. These rights are set out below.

We reserve the right not to comply with any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious, technically very onerous, to involve disproportionate effort or harmful to the rights of others.

When you ask to exercise one of these rights, we may need to ask you for specific information to confirm your identity. This is a security measure to ensure that your personal information is not disclosed to any person who does not have the right to receive it. We may also contact you to ask for more information about your request to speed up our response.

We try to respond to all requests within one month of receiving them. 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.

Asking us about your information You have the right to ask us whether we hold information about you and, if so, for us to give you certain details about that information and/or the information itself. This right is commonly known as a **subject access request**. If you would like to make a subject access request, please do so in writing to the address above.



Correcting inaccurate information If you have reason to believe any of the information we collect on you may be inaccurate or incomplete, and you cannot correct such inaccuracy or omission yourself through your registered account with us, please contact us (see paragraph 1 for how to do this).

Erasing information You have the right to require us to erase your information without undue delay if one of the following applies, unless it is necessary to use your information to comply with a legal obligation or to establish, exercise or defend a legal claim:

- a) the information is no longer necessary for the purposes for which we collected it;
- b) we need your consent to use the information and you withdraw your consent;
- c) you object to us using your information: for the purposes of for the purposes of our legitimate interests (e.g. direct marketing) and there are no overriding legitimate grounds for the processing;
- d) you unsubscribe from our marketing communications in accordance with paragraph 9;
- e) we have used your information unlawfully; or
- f) the information must be erased for compliance with a legal obligation to which we are subject.

Restricting processing You have the right to require us to restrict our use of your information where one of the following applies:

- a) you contest the accuracy of the information that we hold about you, while we verify its accuracy;
- b) we have used your information unlawfully, but you request us to restrict its use instead of erasing it;
- c) we no longer need the information for the purpose for which we collected it, but you need it to deal with a legal claim; or

you have objected to us using your information pursuant to paragraph 8, while we check whether our legitimate grounds override your right to object.

Transmit your personal data to another data controller You have the right to ask us to send the information we have about you to another data controller if one of the following applies:



- a) we needed your consent to be able to process your information;
- b) we only processed your information for the purposes of performing our contract with you;
- c) we processed your information using automated means.

9 YOUR RIGHT TO OBJECT

Where we are using your information on the basis of legitimate interests (see paragraph 4), you have the right to object to this at any time by contacting us using the contact details set out at the top of this section.

10 YOUR RIGHT TO WITHDRAW YOUR CONSENT

Where you have given your consent to us using your information, you have the right to withdraw this consent at any time by contacting us using the contact details set out below. This will not affect the lawfulness of any use of your information that we make before you withdraw your consent.

11 UPDATES

We reserve the right to update this Privacy Policy from time to time by publishing the updated version on our Sites. We therefore encourage you to review our Privacy Policy periodically for the most up to date information.

12 CONTACT US

If you have any questions or complaints about our use of your information, please contact us at <u>info@solutionspt.com or</u> contact Neil Pearce, Commercial Manager by writing to us at our registered office address of Unit 1 Oakfield Road, Cheadle Royal Business Park, Cheadle SK8 3GX. We will do our very best to answer any question and resolve any complaint to your satisfaction. If, for whatever reason, you feel we do not meet the high standards we expect of ourselves, you have a right to complain to the Information Commissioner's Office.