

PETERSON & CONTROL UNION PRIVACY POLICY

1. INTRODUCTION

Welcome to the Peterson & Control Union Privacy Policy.

Peterson & Control Union respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

2. PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how Peterson & Control Union collects and processes your personal data.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

3. WHO IS PETERSON & CONTROL UNION

Peterson & Control Union (“Company”) is made up of different legal entities across the globe. For more information about Peterson & Control Union please go to www.petersoncontrolunion.com. So when we mention “Peterson & Control Union”, “Company”, “we”, “us” or “our” in this Privacy Policy, we are referring to the relevant company in the Peterson & Control Union Group responsible for processing your personal data.

We have appointed an Information Security & Compliance Co-ordinator who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the Information Security & Compliance Co-ordinator using the details set out in Section 14 below.

4. WHAT PERSONAL DATA DO 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 removed (anonymous data).

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy

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 (for example, to provide you with products or services). 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.

5. HOW DOES PETERSON & CONTROL UNION USE YOUR PERSONAL DATA?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at the details set out in Section 14 below.

6. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us on the detail set out in Section 14 below if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you in our systems as a new client, establish communication and contact with you.	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver our services and fulfil our contractual obligations	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business

		reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about our products or services that may be of interest to you	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

7. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

(a) Promotional offers from us

We may use your Identity, Contact, and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and, in each case, you have not opted out of receiving that marketing.

(b) Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Peterson & Control Union group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us using the details set out in Section 14 below at any time.

8. WHO DOES PETERSON & CONTROL UNION SHARE MY PERSONAL DATA WITH?

We may have to share your personal data with the parties set out below for the purposes set out in the table in Section 6 above.

- Group companies, third party service providers and partners who provide data processing services to us;
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- Competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person;
- To any other person with your consent to the disclosure.

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.

9. INTERNATIONAL TRANSFERS

We share your personal data within the Company Group. This may involve transferring, storing and processing your data outside the European Economic Area (EEA).

Whenever we transfer, store and process your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring the correct safeguards are implemented by using specific contracts and clauses approved by the European Commission which give personal data the same protection it has within the EEA. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us using the details set out in Section 14 below if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

10. HOW DOES PETERSON & CONTROL UNION KEEP MY PERSONAL DATA SECURE?

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have 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. When we notify you we will provide you with the relevant details of the personal data breach.

11. HOW LONG WILL PETERSON & CONTROL UNION USE MY PERSONAL DATA FOR?

We retain personal data we collect from you where we have an ongoing legitimate business, legal or contractual need to do so (for example, to provide you with a service you have requested or to comply with applicable tax, legal or accounting requirements).

Where we have no ongoing legitimate business, legal or contractual need to process your personal data, we will either delete or anonymise it, or, if this is not possible (e.g. if your personal information has been stored in backup archives), then we will secure your personal information and isolate it from any further processing until deletion is possible.

12. YOUR DATA PROTECTION RIGHTS

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

- a) **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.
- b) **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.
- c) **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.
- d) **Object to processing** of your personal data where we are relying on a legitimate interest (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, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- e) **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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- f) **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.
- g) **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 using the details set out in Section 14 below.

Time limit to respond

We try to respond to all legitimate requests within one month. 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.

13. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. We will take appropriate measures to inform you, consistent with the significance of the changes we make. 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 your relationship with us.

14. CONTACT DETAILS

If you have any queries in relation to this Policy please contact:

Information Security & Compliance Co-ordinator

Email address: privacy@controlunion.com
privacy@onepeterson.com

Postal address: Boompjes 270
3011 XZ
Rotterdam
The Netherlands

You have the right to make a complaint at any time to your local data protection supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns in the first instance so please feel free to contact us direct.