

GDPR: CUSTOMER PRIVACY NOTICE

1. Introduction

ECHA MICROBIOLOGY LTD ("We / Us") are committed to protecting and respecting your privacy.

This policy (together with our [Website terms of use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

2. Definitions

2.1. Data controller - A controller determines the purposes and means of processing personal data.

2.2. Data processor - A processor is responsible for processing personal data on behalf of a controller.

2.3. Data subject – Natural person ("You / Your")

2.4. Categories of data: Personal data and special categories of personal data

2.4.1. Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

2.4.2. Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

2.5. Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.6. Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

3. Who are we?

3.1. ECHA Microbiology is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: ECHA Microbiology Ltd., Unit 22&23 Willowbrook Technology Park, Llandogo Road, St Mellons Cardiff. CF30EF. For all data matters contact our DATA PROTECTION OFFICER on info@echamicrobiology.com.

4. What Information do we collect?

4.1. ECHA collect and process personal data about you when you interact with us and when you purchase goods and services from us. The personal data ECHA process could include:

- 4.1.1.** Your name;
- 4.1.2.** Your username and password;
- 4.1.3.** Your home or work address (as provided by you), email address and/or phone number;
- 4.1.4.** Your job title;
- 4.1.5.** Your payment and delivery details, including billing and delivery addresses and credit card details, if you make purchases from us. N.B. Credit Card details are processed manually over the phone or by entrusting collection and processing to approved third party payment processing partners.
- 4.1.6.** information related to the browser or device you use to access our website; internet browser and operating system; IP address
- 4.1.7.** and/or any other information you provide

5. How do ECHA use your data and what is ECHA's legal basis for its processing?

5.1. ECHA process your data (not limited to that listed in section 4) for the following purposes:

- 5.1.1.** as required to establish and fulfil a contract if you, as a customer, make a purchase from ECHA or enter into an agreement to receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products or services. ECHA require this information in order to enter into a contract with a you and are unable to do so without it;
- 5.1.2.** to comply with applicable law and regulation;
- 5.1.3.** to protect ECHA's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- 5.1.4.** with your express consent to respond to any comments or complaints ECHA may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services;
- 5.1.5.** ECHA may use information you provide to personalise
 - 5.1.5.1.** our communications;
 - 5.1.5.2.** your interaction with our website; and
 - 5.1.5.3.** products or services for you, in accordance with our legitimate interests;
- 5.1.6.** to monitor use of our websites and online services. ECHA may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;
- 5.1.7.** if you provide a credit or debit card, ECHA use third parties (such as POS payment providers, on line payment processors) to check the validity of the payment card data, you submit in order to prevent fraud, in accordance with our legitimate interests and those of third parties;
- 5.1.8.** ECHA may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- 5.1.9.** ECHA may use your information to invite you to take part in market research or surveys.

5.1.10. ECHA may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

6. With whom and where will ECHA share your data?

- 6.1.** Your personal data will be treated as strictly confidential, and will be shared only with the following third parties;
- 6.1.1.** our professional advisors such as our auditors, IT and software providers, and legal and financial advisors;
 - 6.1.2.** marketing and communications agencies where they have agreed to process your personal data in line with this Privacy Notice and GDPR regulations;
 - 6.1.3.** our suppliers, business partners and sub-contractors where it is necessary for performance of a contract with you; and/or
 - 6.1.4.** search-engine and web analytics companies where they will generate reports for our internal use only;
 - 6.1.5.** Other customers and suppliers, for purposes of providing trade references or testimonials, where you have provided your consent.
 - 6.1.6.** government authorities and/or law enforcement officials if required by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws
- 6.2.** In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

7. Where will ECHA store your data?

- 7.1.** Your data will be stored on ECHA company servers and or third-party servers which may reside outside of the European Economic Area (“EEA”). It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers, in which case the third country’s data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place. Further information may be obtained from our Data Compliance Officer on request at info@echamicrobiology.com.

8. How Long will ECHA keep your data?

- 8.1.** ECHA will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. ECHA are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.
- 8.2.** Where you are a customer, ECHA will keep your information for the length of any contractual relationship you have with us and after that for a period of up to 10 years in line with general documented information requirements. However, on the basis of legitimate interest, we may retain technical reports and other technical information for longer in our file archive; although these documents may contain personal data (name, job title and work contact details) they are not kept for purposes of marketing to you, and are used solely as a technical knowledge base and as a knowledge repository to help us assist you in the future. ECHA will retain your data for a short time beyond the specified retention period, to allow for

information to be reviewed and any deletion to take place. You have a right at any time to request that we delete this information.

- 8.3.** Where you are a prospective customer and you have expressly consented to us contacting you, ECHA will retain your data until you unsubscribe from our communications.
- 8.4.** Where you are a prospective customer but you have NOT expressly consented to us contacting you in the future, we will retain your data while you interact with us and our content and for a period of up to 10 years after the interaction, after which your data will be deleted. Your data can be deleted upon request provided its retention is not required by law or other legitimate reason.
- 8.5.** In the case of any contact you may have with our customer services team, ECHA will retain those details for as long as is necessary to resolve your query and for a period of up to 10 years after the interaction, after which your data will be deleted. Your data can be deleted upon request provided its retention is not required by law or other legitimate reason.
- 8.6.** Email correspondence between ECHA and you which contains personal data will be retained for a period of up to 3 years in an easily accessible format. After that period, it will be archived for a period of up to 10 years, after which your data will be deleted until it is deleted after a maximum of 10 years. All email correspondence containing personal data can be deleted on your request provided it is not required by law or for any other legitimate reason.
- 8.7.** ECHA may delete your data before the retention periods specified above. ECHA may retain your data for a short time beyond the retention periods specified above, to allow for the information to be reviewed and any deletion to take place. In some instances, laws may require ECHA to hold certain information for specific periods other than those listed above.

9. What are your rights in relation to your data?

- 9.1.** You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by not checking certain boxes on the forms ECHA use to collect your data, clicking the unsubscribe button on any communication ECHA have sent to you or by contacting us directly.
- 9.2.** Where you have consented to us using your personal data, you can withdraw that consent at any time.
- 9.3.** If the information ECHA hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.
- 9.4.** You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data ECHA hold about you.
- 9.5.** Where you have provided your data to us and should it be processed by automated means, you may be able to request that ECHA provide it to you in a structured, machine readable format.
- 9.6.** If you have a complaint about how ECHA have handled your personal data, you may be able to ask us to restrict how ECHA use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data
 - 9.6.1.** by withdrawing your consent for us to use it;
 - 9.6.2.** if it is no longer necessary for us to use your personal data;
 - 9.6.3.** if you object to the use of your personal data and ECHA don't have a good reason to continue to use it; or
 - 9.6.4.** if ECHA haven't handled your personal data in accordance with our obligations.

10. Automated Decision Making

- 10.1.** ECHA do not use any form or automated decision making in our business.

11. Further processing

- 11.1.** If we wish to use your personal data for any new purpose, not covered by this Privacy Notice, then we will contact you and provide you with a new notice explaining the new use prior to commencing the processing. The new notice will explain the relevant purposes and processing conditions.

12. Changes to our privacy policy.

- 12.1.** Any changes we may make to our privacy policy in the future will be posted to this document and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

13. How to make a complaint

- 13.1.** Should you have any further questions or require any further information about this Privacy Policy or you wish to exercise your rights you may contact ECHA's Data Compliance Officer by using this email address: info@echamicrobiology.com