

Consolidated Privacy & Cookies Policy

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1. About this Privacy Policy

1.1. Purpose

This Privacy Policy (the “Privacy Policy”) applies to any visitor or user (hereinafter referred to as “you” or “your”) of the Website. We are the controller of Personal Information obtained via our website, or software systems meaning we are the organization legally responsible for deciding how and for what purposes it is used. When we do so we are subject to the applicable provisions of the UK Data Protection Act 2018, the UK General Data Protection Regulation (“UK GDPR”) and the EU General Data Protection Regulation. For any questions or requests under this Privacy Policy, please send us an email at dataprotectionofficer@instro.com

Please read this Privacy Policy carefully to understand how we handle your Personal Information. By sharing your Personal Information with us and by continuing to use the Website or SharePoint systems you confirm that you have read and understood the terms of this Privacy Policy.

This Privacy Policy is divided into the following sections:

5. What Personal Information do we collect about you?
6. How do we use the Personal Information we collect about you?
7. What is our legal justification for using your Personal Information?
8. With whom do we share your Personal Information?
9. For how long do we keep your Personal Information?
10. How does Instro Precision keep your Personal Information secure?
11. Transferring your Personal Information outside of the UK.
12. What choices and rights do you have regarding your Personal Information?
13. Does this Privacy Policy apply to third party links?
14. Children’s Privacy.
15. How do we approach changes to this Privacy Policy?
16. How do we use cookies?
17. Governing Law and Jurisdiction.

2. What Personal Information Do we Collect About You?

2.1 Personal Information that you give to us when using the online forms provided on our website. When you send a message to contact us using the Website we collect the following categories of Personal Information: your name, company, phone number, email address, country and any other Personal Information you include within your message to us.

2.2 Personal Information that we collect about you. Each time you visit the Website we will automatically collect any of the following information:

(a) Technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, domain name and country which requests information, the files requested, browser type and version, browser plug-in types and versions, operating system and platform; and

(b) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads.

The Personal Information that described in sections 2.2(a) and (b) will remain anonymised and will kept separately from the data described in section 2.1(a).

3. How Do We Use The Personal Information We Collect About You?

3.1 We will use your Personal Information only as necessary for any of the following purposes:

1. To allow you to access and use the Website;
2. To provide technical support;
3. To ensure the security of our services and our Website;
4. To recognise you when you return to our Website;
5. To ensure that the Website is functioning correctly and to monitor, investigate any bug with, and improve the Website;
6. To provide you with the information, products and services you request from us;
7. For research purposes, where data will be anonymised where possible, to improve our products and services;
8. To provide you with a tailored service;
9. To improve your experience;
10. To improve your user experience;
11. Where you become a customer, to issue invoices;
12. To contact relevant stakeholders;
13. If you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters), but only where you have consented to this.

4. What is Our Legal Justification For Using Your Personal Information

4.1 We will only use your Personal Information for the purposes set out in this Privacy Policy where we have a “legal basis” for handling it. This means that at least one of the following conditions applies in each situation where your Personal Information is used by us:

(a) our use of Personal Information is necessary to perform our obligations under any contract with you (for example comply with the terms of use of our website which you accept by browsing our website and/or to comply with our contract to provide services to or receive services from you or your employer); or

(b) our use of your Personal Information is necessary for complying with our legal obligations: for example, if we are requested to disclose your Personal Information to regulatory bodies or law enforcement authorities; and/or

(c) where neither (a) nor (b) apply, use of your Personal Information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our Website). Our legitimate interests include the following, to:

(i) run, grow and develop our business;

(ii) detect and prevent fraud;

(iii) operate our Website and keep our Website and IT Systems secure;

(iv) conduct marketing, market research and business development;

(v) provide goods and services to our customers, make and receive payment, provide customer services and to know the customer that we are providing services to; and

(vi) conduct internal administrative activities, as described in section 4 (below).

If we rely on your consent for us to use your Personal Information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at: dataprotectionofficer@instro.com and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to provide services to you.

5. With Whom Do We Share Your Personal Information

5.1 We do not sell, rent or lease your Personal Information to third parties. We will only share your Personal Information with the following recipients in the following limited circumstances:

(a) in order to provide and maintain the Website, we will share Personal Information with our trusted service providers for them to deliver technical, IT, hosting, logistical or administrative services and process the data for us in accordance with our instructions, and we will verify that the recipient has appropriate security and confidentiality measures in place to protect the Personal Information;

(b) to the extent required or authorised by law, if we think it is necessary to comply with the law or if we need to do so to protect or defend our legal rights, or the rights of others (including to investigate and protect our users from fraudulent or unlawful use of the Website), we will share your Personal Information with third parties requiring information for legal reasons or third party investigators, authorities, regulators or law enforcement bodies;

(c) your Personal Information will be shared with any member of the Instro Precision, Parent Company Group & Third Party Suppliers where we consider that it is in our legitimate interests to do so for internal administrative purposes (for example, ensuring consistent and coherent delivery of services to our customers, corporate strategy, compliance, auditing and monitoring, research and development and quality assurance).

5.2 We will also disclose your Personal Information to third parties:

(a) where it is in our legitimate interests to do so to run, grow and develop our business;

(b) if we sell or buy any business or assets, we will disclose your Personal Information to the prospective seller or buyer of such business or assets;

(c) if Instro Precision or substantially all of its assets are acquired by a third party, in which case Personal Information held by Instro Precision will be one of the transferred assets;

(d) to enforce contracts with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or

(e) to protect the rights, property or safety of the Instro Precision, Parent Company Group & Third Party Suppliers, or their respective employees, customers, suppliers or other persons.

6. Non-Compliance

6.1 Generally, Instro Precision does not retain information longer than necessary for its reasonable business and lawful needs. If you withdraw your consent to us processing your Personal Information, we will erase your Personal Information from our systems, unless the Personal Information is required for Instro Precision to establish, exercise or defend against legal claims or it is necessary for the performance of any requested service.

7. How Does Instro Precision Keep Your Personal Information Secure

7.1 The security of your Personal Information is of paramount importance to us. We shall use appropriate technical and organisational measures to protect Personal Information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. All information that is collected through the Website is processed on secure data servers.

In the course of provision of your Personal Information to us, your Personal Information is likely to be transferred over the internet and/or stored on a cloud-based server. Although we make every effort to protect the Personal Information which you provide to us, the transmission of information over the internet and storage in a cloud-based server is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your Personal Information transmitted to our website and that any such transmission is at your own risk.

8. Transferring Your Personal Information Outside of The UK

8.1 The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy. It is sometimes necessary for us to transfer your Personal Information to countries outside the UK. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your Personal Information. We may transfer your Personal Information to Instro Precision, Parent Company Group & Third Party Suppliers

8.2 Under data protection laws, we can only transfer your Personal Information to a country outside the UK where:

(a) in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of Personal Information (known as an 'adequacy regulation') further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available here. We

rely on adequacy regulations for transfers to countries outside the UK.

- (b) there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- (c) a specific exception applies under relevant data protection law.

8.3 Where we transfer your Personal Information outside the UK we do so on the basis of an adequacy regulation or (where this is not available) legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your Personal Information outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

8.4 Any changes to the destinations to which we send Personal Information or in the transfer mechanisms we rely on to transfer Personal Information internationally will be notified to you in accordance with the section 11 below.

9. What Choices And Rights Do You Have Regarding Your Personal Information

9.1 You may contact us using the contact details provided at the start of this Privacy Policy to request that we:

- (a) confirm whether or not Personal Information about you is being processed;
- (b) provide you with further details about how we process your Personal Information;
- (c) provide you with a copy of any data which we hold about you;
- (d) update/correct any of you Personal Information;
- (e) delete any Personal Information which we hold about you;
- (f) restrict the way that we process your Personal Information;
- (g) consider any valid request to transfer your Personal Information to a third party provider of services (data portability);
- (h) consider any valid objections which you have to the use of your Personal Information;

9.2 Instro Precision will consider all such requests and provide our response within a reasonable period (and in any event within any time period required by applicable law). Please note that those rights do not always apply and there are certain exceptions to them. We will also need to confirm your identity before acting on certain requests.

9.3 If you have a complaint about how we use your Personal Information, we would always prefer you to contact us first. However, you may also make a complaint to your local data protection authority in the country where we are based or where we monitor your behaviour.

10. Does This Privacy Policy Apply To Third Party Links

10.1 You may, during your use of the Website, access links to or other websites operated by third parties outside of Instro Precision. Please note that this Privacy Policy only applies to the Personal Information that we (or third parties on our behalf or any other member of the Instro Precision, Parent Company Group & Third-Party Suppliers) collect from or about you and we cannot be responsible for Personal Information collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any Personal Information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or policies.

11. Children's Privacy

11.1 The Website is not intended for children under the age of 16. We do not, knowingly or intentionally collect information about children who are under 16 years of age.

IF YOU ARE UNDER THE AGE OF 16 YOU MAY NOT USE THE WEBSITE, UNLESS PARENTAL CONSENT IS PROVIDED ACCORDINGLY.

12. How Do We Approach Changes to This Privacy Policy

12.1 We will change this Privacy Policy from time to time, and all amendments will be made directly to this policy or webpage.

13. How Do We Use Cookies

13.1 A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

14. Governing Law and Jurisdiction

14.1 This Privacy Policy will be governed and interpreted pursuant to the laws of England and Wales without giving effect to its choice of law rules. You expressly agree that the exclusive jurisdiction for any claim or action arising out of or in connection with this Privacy Policy shall be the courts of England, to the exclusion of any other jurisdiction.