# ZEHNDER GROUP UK DATA PRIVACY POLICY

Your privacy is important to us. This policy explains our online information practices and the choices you can make about the way your personal information is collected and used on any online platforms controlled by Zehnder Group UK (referred to as "Zehnder", "we", "our" or "us" in this policy).

By submitting your personal information to us, or by using any of our websites, you agree to the processing of your personal information as described in this policy. Please ensure that you read this policy carefully before using any of our sites.

This policy applies to all websites operated and controlled by Zehnder Group UK Ltd, including www.zehnder.co.uk, www.greenwood.co.uk and www.bisque.co.uk. Please note that these may contain links to other Zehnder Group web pages to which different data protection policies may apply.

Questions regarding this policy should be directed to our Data Protection Compliance Manager. The Data Protection Compliance Manager is responsible for ensuring compliance with relevant data protection legislation and this policy and can be contacted by email at <u>data@zehnder.co.uk</u> or by post at Zehnder Group UK Ltd, Concept House, Watchmoor Point, Camberley, Surrey, GU15 3AD. Any questions about the operation of this policy or any concerns that the policy has not been complied with should be referred in the first instance to the Data Protection Compliance Manager.

# 1. What information do we hold about you?

We may collect, store and use general data and/or personal data about you (referred to throughout this privacy policy as "personal information"):

# Website users

- IP address
- Date and time of the request
- Time zone difference relative to GMT
- Content requested
- Access status/http status code
- The specific quantity of data transferred
- Web page from which the request originated
- Browser (incl. language and version)
- Operating system
- Newsletters (Clean Air Solutions)

We log every access to our websites and every time a file stored on the websites is accessed.

# Customers

On making a purchase from our website, you will be redirected to a third party secure server.

To complete your purchase, you will be asked to submit the following personal information:

- Customer name
- Delivery address
- Billing address
- Email address
- Credit or debit card details for payment

This personal information will not be stored by us. The credit or debit card details will be entered via the third party secure server and the associated data will be destroyed when you terminate your browsing session.

If you have purchased a filter via our website, you will receive a filter service reminder by email to re-purchase the filter before its expiry.

You will not be sent marketing emails following your purchase from our website.

# My.Zehnder account holders

If you choose to create a My.Zehnder account, we will ask your permission to save the following personal information:

- Account holder name
- Address
- Email address
- Contact telephone number

We will not store payment details as part of your My.Zehnder account.

# Contact form

By filling out a contact form on our website, we will request submission of the following personal information:

- Name
- Company (if applicable)
- Address
- Email address
- Contact telephone number

We will only contact you in relation to the specific enquiry within your contact form.

# Generally

- If you visit our offices, images and videos are recorded by the CCTV system in operation on our premises.
- Information gathered when you visit our offices via our visitor electronic sign-in process, including your name.
- Any personal information you provide to us during your interactions with us.
- Information gathered by cookies used on our website. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse and also allows us to improve the way our website

works. For detailed information on the cookies we use and the purposes for which we use them please refer to our Cookie Policy which is located at the end of this policy.

• Information provided to us by third party service providers we work with, for example, payment service or analytics providers.

# 2. How will we use your personal information and what is the legal ground we rely on for doing so?

We will only use your personal information when the law allows us to. When we use your personal information, we must have a legal ground for doing so. The following are (amongst others) the legal grounds by which we can use your personal information:

- Where you have provided us with your consent for us to do so;
- Where we need to perform the contract we have entered into with you or to take steps to enter into a contract with you;
- Where we need to comply with a legal obligation to which we are subject;
- Where it is in pursuit of our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

### Website Users

- To display your web page and ensure its stability and security *in pursuit of our legitimate interests to ensure there are no technical issues when accessing our website at <u>https://www.zehnder.co.uk/</u>.*
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes *in pursuit of our legitimate interests (to better understand how people interact with our website and solve any issues it may have*).
- To improve our website to ensure that content is presented in the most effective manner for you and your computer *in pursuit of our legitimate interests (to improve our content and your experience)*.

# Customers

- Your purchase details in pursuit of our legitimate interests (to facilitate business between you or your business and us).
- Your contact details to provide you with a service reminder *performance of a contract with you*.
- To transfer to third party service providers in pursuit of our legitimate interests (in outsourcing for effectiveness and efficiency).
- To transfer to our delivery providers DPD and Foredco *in pursuit of our legitimate interests (in outsourcing for effectiveness and efficiency).*
- To transfer to our payment provider Payvision in pursuit of our legitimate interests (in outsourcing for effectiveness and efficiency).

# My.Zehnder account holders

• Your contact details held saved to your My.Zehnder account – where you have provided us with your consent for us to do so.

# **Contact Form**

• Your contact details when dealing with your enquiry made via the Contact Form on our website – in pursuit of our legitimate interests to ensure your enquiry is dealt with promptly and efficiently.

# Generally

- To ensure our premises are kept secure in pursuit of our legitimate interests (in ensuring our premises are kept secure and to keep evidence of this).
- Health and safety purposes to comply with a legal obligation.
- To contact you if we wish to use your information for a purpose not set out in this policy - to comply with a legal obligation.
- Your personal information provided to us over the telephone *in pursuit of our legitimate interests to ensure that your enquiry is dealt with promptly and efficiently.*

# 3. What happens if there is a change of purpose?

We will only use your personal information 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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

# 4. Which type of third parties might we share your personal information with?

We require third parties to respect the security of your personal information and to treat it in accordance with the law. For example, where we instruct third party service providers, we carry out due diligence on those providers to ensure they treat your personal information as seriously as we do.

We may share your personal information with the following types of third parties:

- Technical support providers, for example, assisting with our website.
- Providers assisting us with secure online payments.
- Recruitment agencies assisting us with filling our vacancies.
- Professional advisers such as lawyers, accountants, insurance companies and business analysts.
- Providers which help us collate and organise information effectively and securely.
- Providers which help us generate and collate surveys and reviews of our products and services.
- Providers which assist us with marketing by, for example, helping us send marketing mailshots.

- Third party software hosting companies which provide us with software solutions.
- Providers which host our servers in their data centres.

## 5. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.

We assess the appropriate retention period for different information based on the size, volume, nature and sensitivity of that information, the potential risk of harm to you from unauthorised use or disclosure of that information, the purposes for which we are using that information, applicable legal requirements for holding that information, and whether we can achieve those purpose(s) through other means.

#### Website users

• Where you use our website and one of our cookies are activated, that cookie will operate for the duration set out in our Cookie Policy.

#### Customers

• We will keep your personal information for as long as we and you do business together or for as long as we have a commercial interest in holding your personal information, for example, with a view you may make a purchase in the future.

#### My.Zehnder account holders

• We will keep your personal information for as long as we have your consent to do so.

#### Contact form

• We will keep your personal information for the duration that your enquiry is outstanding and until it has been resolved.

# Generally

• Our server logs which log IP addresses are deleted after 30 days.

#### 6. Where we store your personal data

Electronic versions of your personal information are stored on our servers in the United Kingdom and within the EEA.

Where we use third party service providers to assist us, your personal information may also be stored in accordance with their practices and procedures. We require third parties to respect your personal information and to treat it in accordance with the law.

Where your data is transferred to and outside of the EEA, we will take steps to ensure your personal information is adequately protected.

# 7. Rights of access, correction, erasure and restriction

Under certain circumstances, by law you have the right to:

- Request access to your personal information (known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information when there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Compliance Manager in writing using the contact details set out at the beginning of this privacy policy.

#### 8. No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

#### 9. 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 any personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to another person who has no right to receive it.

# 10. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Compliance Manager in writing using the contact details set out at the beginning of this privacy policy.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

# 11. What happens if you fail to provide personal information?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with our products or services), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of visitors to our premises).

### 12. Right to complain

You have the right to make a complaint if you wish to do so. The organisation with oversight of our processing is the Information Commissioner's Office, which can be contacted in writing at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone (0303 123 1113) or by their website (https://ico.org.uk/make-a-complaint/).

# 13. Changes to this privacy notice

We may change, modify, add or remove portions of this policy at any time, and any changes will become effective immediately.

Any changes we make to our privacy policy will be posted on this page and, where appropriate, notified to you.

### 14. Cookies and web tracking

Our websites use cookies, which are small text files that are stored on your computer and which can be accessed again at a later time. Cookies make it possible for you to subscribe to our services and make it possible for us to personalise the websites for your needs. To this end, our web pages are supported by cookies that collect information about your IP address, the time and duration of your visit, the number of times you visit, use of forms, your search settings, the view mode you are using and your 'favourites' settings while you are on our websites. The length of time for which the various cookies are stored differs.

You can prevent our web pages from creating cookies by adjusting the relevant setting on the web browser being used; this allows you to permanently opt out of cookies. Moreover, cookies that have already been set can be deleted at any time using a web browser or other software program. All common web browsers support this function. If the person concerned deactivates cookies on the web browser being used, some functions on our web page may not be available or fully functional.

We will not store any information about your activities that can be read by a third party.

When you terminate the browsing session, the cookies are destroyed.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages.

You can at any time change or withdraw your consent from the Cookie Declaration on our website.

Learn more about who we are, how you can contact us and how we process personal data in our Privacy Policy.

Your consent applies to the following domains: www.zehnder.co.uk Your current state: Use necessary cookies only.

Your current state: Do Not Sell My Personal Information.

Your current state: Allow selection (Necessary, Preferences, Statistics, Marketing).

Your current state: Allow all cookies. Your consent ID: JRgpdTU+02HP/oYjXpyez8Oz+KPRGPq8w7wljA1SJhonbvsR9QU3Ww==Consent date: Monday, May 10, 2021 04:29:34 PM Change your consent | Withdraw your consent Do Not Sell My Personal Information

Cookie declaration last updated on 02/05/2021 by Cookiebot: **Necessary (8)** 

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

| Name          | Provider          | Purpose  | Expiry     | Туре                     |
|---------------|-------------------|--|------------|--------------------------|
| cfduid        | fast.fonts.net    | Used by the content network,<br>Cloudflare, to identify trusted<br>web traffic.                    | 30 days    | HTTP<br>Cookie           |
| CookieConsent | Cookiebot         | Stores the user's cookie consent state for the current domain                                      | 1 year     | HTTP<br>Cookie           |
| csrftoken     | Eventbrite        | Helps prevent Cross-Site<br>Request Forgery (CSRF)<br>attacks.                                     | 1 year     | HTTP<br>Cookie           |
| debug         | Eventbrite        | Pending  | Persistent | HTML<br>Local<br>Storage |
| has_js        | www.zehnder.co.uk | Registers whether or not the user has activated JavaScript in the browser.                         | Session    | HTTP<br>Cookie           |
| myzehnder-0   | www.zehnder.co.uk | This cookie collects user<br>data: user name, user ID,<br>language, country,<br>download, bookmark | 30 days    | HTTP<br>Cookie           |
| SESS#         | www.zehnder.co.uk | Preserves users states across page requests.   | Session    | HTTP<br>Cookie           |
| SSESS#        | www.zehnder.co.uk | Preserves users states across page requests.   | Session    | HTTP<br>Cookie           |

#### Preferences (2)

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

| Name         | Provider | Purpose                     |  |          |          | Expiry  | Туре           |
|--------------|----------|-----------------------------|--|----------|----------|---------|----------------|
| lang<br>[x2] | LinkedIn | Remembers<br>version of a w |  | selected | language | Session | HTTP<br>Cookie |

#### Statistics (8)

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

| Name                 | Provider             | Purpose  | Expiry  | Туре             |
|----------------------|----------------------|--|---------|------------------|
| _dc_gtm_UA-#         | Google               | Used by Google Tag Manager to control the loading of a Google Analytics script tag.  | 1 day   | HTTP<br>Cookie   |
| _ga [x2]             | Eventbrite<br>Google | Registers a unique ID that is used to generate statistical data on how the visitor uses the website.   | 2 years | HTTP<br>Cookie   |
| _gat                 | Eventbrite           | Used by Google Analytics to throttle request rate  | 1 day   | HTTP<br>Cookie   |
| _gid [x2]            | Eventbrite<br>Google | Registers a unique ID that is used to generate statistical data on how the visitor uses the website.   | 1 day   | HTTP<br>Cookie   |
| AnalyticsSyncHistory | LinkedIn             | Used in connection with data-<br>synchronization with third-party<br>analysis service.   | 29 days | HTTP<br>Cookie   |
| collect              | Google               | Used to send data to Google<br>Analytics about the visitor's device<br>and behavior. Tracks the visitor<br>across devices and marketing<br>channels. | Session | Pixel<br>Tracker |

**Marketing (17)** Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

| Name        | Provider  | Purpose  | Expiry     | Туре                     |
|-------------|-----------|--|------------|--------------------------|
| _uetsid     | Microsoft | Collects data on visitor<br>behaviour from multiple<br>websites, in order to<br>present more relevant<br>advertisement - This also<br>allows the website to limit<br>the number of times that<br>they are shown the same<br>advertisement. | 1 day      | HTML<br>Local<br>Storage |
| _uetsid_exp | Microsoft | Contains the expiry-date for the cookie with corresponding name.   | Persistent | HTML<br>Local<br>Storage |
| _uetvid     | Microsoft | Used to track visitors on<br>multiple websites, in order<br>to present relevant<br>advertisement based on<br>the visitor's preferences.  | 16 days    | HTML<br>Local<br>Storage |
| _uetvid_exp | Microsoft | Contains the expiry-date for the cookie with corresponding name.   | Persistent | HTML<br>Local<br>Storage |

| Name                             | Provider   | Purpose   | Expiry     | Туре                     |
|----------------------------------|------------|---|------------|--------------------------|
| ads/ga-audiences                 | Google     | Used by Google AdWords<br>to re-engage visitors that<br>are likely to convert to<br>customers based on the<br>visitor's online behaviour<br>across websites.  | Session    | Pixel<br>Tracker         |
| bcookie                          | LinkedIn   | Used by the social<br>networking service,<br>LinkedIn, for tracking the<br>use of embedded<br>services.   | 2 years    | HTTP<br>Cookie           |
| bscookie                         | LinkedIn   | Used by the social<br>networking service,<br>LinkedIn, for tracking the<br>use of embedded<br>services.   | 2 years    | HTTP<br>Cookie           |
| EB.fonts.neueplak.03-19-<br>2019 | Eventbrite | Implements and collects<br>data on the user's<br>interaction with the<br>EventBrite-integration.<br>This service is used to<br>promote and sell tickets to<br>events across multiple<br>websites.                             | Persistent | HTML<br>Local<br>Storage |
| G                                | Eventbrite | Pending   | 1 year     | HTTP<br>Cookie           |
| kampyle_userid                   | Eventbrite | Collects data on the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded with the purpose of generating reports for optimising the website content. | 1 year     | HTML<br>Local<br>Storage |
| kampyleSessionPageCounter        | Eventbrite | Collects data on the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded with the purpose of generating reports for optimising the website content. | 1 year     | HTML<br>Local<br>Storage |
| kampyleUserSession               | Eventbrite | Collects data on the user's visits to the website, such as the number of visits,  | 1 year     | HTML<br>Local<br>Storage |

| Name                     | Provider   | Purpose   | Expiry  | Туре                     |
|--------------------------|------------|---|---------|--------------------------|
|                          |            | average time spent on the<br>website and what pages<br>have been loaded with the<br>purpose of generating<br>reports for optimising the<br>website content.   |         |                          |
| kampyleUserSessionsCount | Eventbrite | Collects data on the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded with the purpose of generating reports for optimising the website content. | 1 year  | HTML<br>Local<br>Storage |
| lidc                     | LinkedIn   | Used by the social<br>networking service,<br>LinkedIn, for tracking the<br>use of embedded<br>services.   | 1 day   | HTTP<br>Cookie           |
| mgref                    | Eventbrite | Collects information on<br>user preferences and/or<br>interaction with web-<br>campaign content - This is<br>used on CRM-campaign-<br>platform used by website<br>owners for promoting<br>events or products.                 | 1 year  | HTTP<br>Cookie           |
| MUID                     | Microsoft  | Used widely by Microsoft<br>as a unique user ID. The<br>cookie enables user<br>tracking by synchronising<br>the ID across many<br>Microsoft domains.  | 1 year  | HTTP<br>Cookie           |
| UserMatchHistory         | LinkedIn   | Used to track visitors on<br>multiple websites, in order<br>to present relevant<br>advertisement based on<br>the visitor's preferences.   | 29 days | HTTP<br>Cookie           |

# 15. Social media plugins

We currently use the social media plugins shown in the following table. We use a two-click procedure in which, upon first visiting our web page, no personal data is forwarded to the providers of the various plugins. The plugin providers will not receive the information that you have accessed a specific website of our online presence unless you click on the marked plugin field and activate it.

The plugin providers store the data collected about you as a user profile, which they use for advertising, market research and/or to design their websites in line with users' needs. We have no influence on the data collected by the plugin providers or on their data processing procedures. The activities of such third-party providers in this regard are subject to their own respective data protection policies. More information on the purpose and scope of data collection and processing by the plugin providers is available in the data protection policies of these providers, which are listed below.

#### More information

| Plugin  | Provider and data protection policy                                    |  |  |  |
|---|--|--|--|--|
| YouTube Content   | Google LLC: https://policies.google.com/privacy                        |  |  |  |
| Xing Share  | Xing SE: http://www.xing.com/privacy                                   |  |  |  |
| Facebook<br>Content/Share   | Facebook Inc.: https://www.facebook.com/about/privacy/update           |  |  |  |
| Google+ Content/ShareGoogle LLC: https://policies.google.com/privacy                  |  |  |  |  |
| Twitter Content/Share Twitter Inc.: https://twitter.com/privacy                       |  |  |  |  |
| LinkedIn Content/ShareLinkedIn Corporation: https://www.linkedin.com/legal/privacy-po |  |  |  |  |
| Pinterest Share   | Pinterest Inc.: https://policy.pinterest.com/en/privacy-policy         |  |  |  |
| WhatsApp Share  | WhatsApp Inc.: https://www.whatsapp.com/legal?eea=1#privacy-<br>policy |  |  |  |