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## 1.0 PURPOSE

Smiley Monroe are committed to protecting and respecting your privacy. We understand our responsibilities under the General Data Protection Regulation (GDPR), as well as our obligations to ensure we are clear how your data is handled while in our possession.

This policy provides details on what data we collect about you, why we collect it, what we do with it, and your rights in relation to our processing of this data.

## 2.0 SCOPE

This policy applies to customers, suppliers, website users and third parties. These groups of people are referred to in this policy as you.

## 3.0 WHO WE ARE

Smiley Monroe Ltd has grown to become the leading global producer of hot spliced Endless Conveyor Belts and Custom Cut Parts for the materials processing equipment manufacturing sector. The company products are exported to 60 countries serving 7 equipment segments; crushing, screening, recycling, washing, environmental and road construction.

Smiley Monroe's head office is at 23 Ferguson Drive, Knockmore Hill Industrial Park, Lisburn, BT28 2EX. We can be contacted at [hello@smileymonroe.com](mailto:hello@smileymonroe.com) or by telephoning 02892 673777.

## 4.0 DATA PROTECTION PRINCIPLES

This policy has been developed to help the Company be compliant with the regulations. The regulations clearly set out principles which any party handling data must comply with. These principles are that all data shall be:

- processed fairly, lawfully and in a transparent manner
- collected for specific, explicit, and legitimate purposes
- adequate, relevant and limited to what is necessary for the purposes of processing
- accurate and up to date
- not kept for longer than is necessary for its given purpose
- processed in a manner that ensures appropriate security of the data
- compliant with the relevant GDPR procedures for international transferring of personal data.

## 5.0 WHAT INFORMATION WILL WE COLLECT FROM YOU?

When providing or receiving goods and services 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, last name, title, job title, company name, gender

Contact Data – includes mailing address, email address and telephone numbers

Transaction Data – includes details of products and services you have purchased from us or we have purchased from you

Financial Data – includes payment method, bank account details, payment history and company owner / director details

Technical Data – includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website

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Usage Data – includes information about how you use our website, products or services

Aggregated Data – includes statistical or demographic data

## 6.0 HOW WILL WE 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 carry out our obligations arising from any contracts entered into between you and us
- To provide you with information, products and services we offer that are similar to those that you have already purchased or enquired about
- To notify you about changes to our products and services
- Where we need to comply with a legal or regulatory obligation
- To provide relevant marketing communications relating to our business

Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent at any time by contacting us using the details at the end of this policy.

## 7.0 WHY DO WE COLLECT AND USE YOUR PERSONAL DATA?

The reasons we process your personal data are listed below. Please be aware 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.

Purpose / Activity	Type of Data	Lawful Basis for Processing
To register you as a new customer or supplier	Identity Contact	Performance of a contract with you
To process and deliver your order including managing any payments which are due	Identity Contact Financial Transaction Marketing	Performance of a contract with you  Necessary for our legitimate interests
<b>To manage our relationship with you which will include:</b>  (a) Notifying you about changes to our terms or policies  (b) Asking you to provide feedback on our products and services	Identity Contact Financial Transaction Marketing	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how customers rate our products/services, to develop them and grow our business)
<b>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</b>	Identity Contact Profile Marketing	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)  Necessary to comply with a legal obligation

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<b>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we send to you</b>	Identity Contact Usage Marketing Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our business strategy)
<b>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</b>	Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our business strategy)
<b>To make suggestions and recommendations to you about goods or services that may be of interest to you</b>	Identity Contact Technical Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

## 8.0 WHO WILL WE SHARE YOUR PERSONAL DATA WITH?

We may share your information including personal data with the following parties for the purposes set out above:

- Any employee of Smiley Monroe.
- Selected third parties including business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them or you.
- Professional advisers including lawyers, bankers, auditors, and insurers.
- HM Revenue & Customs, Invest NI and other regulators and authorities who require reporting of processing activities in certain circumstances.
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.

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.

## 9.0 DATA PROCESSING OUTSIDE OF EEA

We may share your personal data with members of Smiley Monroe India or Smiley Monroe Inc which may require transferring your data outside of EEA. We will ensure your personal data is protected by requiring all members of Smiley Monroe to follow the same rules when processing your personal data.

## 10.0 HOW LONG WILL YOUR INFORMATION BE KEPT?


We have statutory legal obligations to keep some information for a period of time after it has been used. We will not keep any information after it has been used that we are not required to keep under these statutory or legal obligations.

Once information is no longer required it will be erased from our systems in a controlled and secure manner.

## 11.0 HOW WILL WE PROTECT YOUR INFORMATION?

We will endeavour to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of the personal data in question. These safeguards are designed to protect your personal data from loss and unauthorised access, copying, use, modification or disclosure.

We provide all employees who process or have access to personal data with GDPR and data protection training.

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## 12.0 YOUR RIGHTS

You can contact us at any time using the details in section 14 of this policy for one or more of the following reasons:

- To ask us to fix information about you that is wrong or incomplete, this is known as a right to rectification.
- To ask us to delete information about you, this is known as the right to erasure.
- To tell us you no longer agree to us using information about you and ask us to stop, this is known as a right to object.
- To tell us to stop using information about you to sell you products and services, which is known as the right to restrict processing.
- To make a "subject access request" – which is a request for us to send you the information we have about you.
- To ask us to provide you or someone else (on your request) in a structured, commonly used and machine-readable format with the information you have provided to us about yourself. This is known as a "data portability" right.

## 13.0 COOKIES ON OUR WEBSITE

The smileymonroe.com website uses a number of cookies to enable you to use our website, and to help us to continue improving the user experience of our website. You can find out more about how we use cookies by viewing our Cookie Policy.

## 14.0 COMPLAINTS

If at any time you are unhappy with how the Company has processed or processes your data, or if you wish to exercise any of your rights outlined in section 12 please contact our Data Protection Officer by emailing [hello@smileymonroe.com](mailto:hello@smileymonroe.com) or telephoning 02892 673777.

If you feel your request was not handled or dealt with correctly by the Company you may wish to raise the issue with the Information Commissioners Office on 0303 123 1113.