

Sloan Water Technology Limited

UK Privacy Policy

This privacy policy is kept under regular review and was last updated on: July 20, 2021

Introduction

This privacy policy relates to your use of this website www.sloanwatertechnology.co.uk maintained by **Sloan Water Technology Limited**, a private company registered in England with company registration number 11222452, (**we** or **us**).

We respect your privacy and are committed to protecting your personal data. This privacy policy sets out how we look after your personal data when you visit this website (regardless of where you visit it from). It tells you about your privacy rights and how the law protects you.

1. Important information and who we are

We are a wholly owned subsidiary of Sloan Global Holdings, LLC which maintains its own website www.sloan.com in the USA (the **US Site**). **The US site is intended only for residents of the United States.** The US Site has its own privacy policy governed by Illinois law. If visiting the US Site you should ensure that you understand its policy, which differs from this policy in a number of key areas.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 other notices and privacy policies and is not intended to override them.

It is important that any personal data we hold about you is accurate and current. Please keep us informed if any of any personal data relating to you that we may hold in the future changes during your relationship with us.

2. Contact

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please e-mail us at enquiries@sloanwatertechnology.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. Controller

We will be the controller in respect of, and responsible for, any of your personal data that may in the future be gathered through this website.

Sloan Global Holdings, LLC will be the controller in respect of, and responsible for, any of your personal data that is gathered through the US Site.

4. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

5. The data 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 do not currently collect any personal data through your interactions with this website. This includes special categories of personal data (such as details of race, ethnicity, religious or philosophical beliefs, sexual orientation, political opinions or health). If we do start to collect personal data through this website we will amend this privacy policy to provide details of the data we are collecting and ways in which it will be used.

However, please note that we may collect personal data in the following ways:

- If you e-mail us with an enquiry using the e-mail address provided on our site then we may collect your contact details, and any personal data that you may provide to us in your enquiry. This information will be used only for the purposes of dealing with the enquiry that you have made.
- In the future we may enable an electronic contact form on the website to make it easier for users of this website to get in touch. When this happens then we may collect your contact details, and any personal data that you may provide to us in the contact form. This information will be used only for the purposes of dealing with the enquiry that you have made using the contact form.
- In the future we may enable you to create an account on our website. We may collect certain personal data (such as name and contact details) so that we can create your account. This information will be used only for the purposes of creating and maintaining such an account.
- From time to time we may post details of job vacancies on our website or in other media. We may collect any personal data that you provide to us if responding to such opportunities. This information will be used only for the purposes of processing any application you make for any available vacancies. If you become an employee your personal data will be governed by our internal privacy policy and practices that apply to all of our employees.

Please note that personal data may be collected if you interact with our US Site, and you should read the privacy policy for the US Site for further information.

We may collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. Until such time as we amend this policy to state otherwise, we will not combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you.

6. Future Changes

We may in the future enable users of this site to create accounts, subscribe to newsletters, order products or otherwise interact with this site in a way that would require the provision of personal data to us.

If we make such changes we will amend this privacy policy to provide details of the data we are collecting and ways in which it will be used.

7. Legal basis for collecting your personal data

We will only collect and use your personal data in the future 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. **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. This would include responding to enquiries you send to us using the e-mail address and/or contact form provided on our website. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you

(unless we have your consent or are otherwise required or permitted to by law).

- Where the processing of your personal data is necessary to comply with a legal obligation to which we are subject.

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

8. Marketing

We will always get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You have the right to withdraw consent to marketing at any time by contacting us, or by selecting the 'unsubscribe' option in any e-mail that you receive.

9. Cookies

This website does not currently use cookies, or any equivalent technology, to track your interactions with it. We may in the future use cookies to improve your experience as you interact with our website. These cookies would automatically collect technical data about your equipment, browsing actions and patterns.

If we implement the use of cookies we will update this privacy policy to include a cookie policy.

10. International transfers

We may share your personal data within the Sloan group, in particular with our US parent entity, Sloan Global Holdings, LLC.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that your personal data is only transferred:

- to countries that have been deemed by the ICO to provide an adequate level of protection for personal data; or
- on the basis of specific contracts, in a form approved for use in the UK by the ICO, which give personal data the same protection it has in the UK.

Any personal data that may be transferred to our US parent entity will be transferred using the second of these options.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

11. Data security

Before we collect and use your personal data we will ensure we have first put in place appropriate security measures to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will 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.

12. Data retention

We will only retain any personal data that we may collect for as long as reasonably necessary to fulfil the purposes for which we collected it, unless we anonymise it (in which case we may use this information indefinitely without further notice to you).

Where you contact us using the e-mail address and/or contact form provided on our website then, unless required by law or as set out above, we will generally delete your personal data 6 months after your last interaction with us.

13. Your legal rights

You have certain rights under data protection laws in relation to any of your personal data that we have collected. We have set out a

summary of these rights in the following table.

You have the right to:

- **request access** to any personal data that we may hold about you (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.
- **request correction** of any personal data that we may hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected. We may need to verify the accuracy of the new data you provide to us.
- **request erasure** of any personal data that we may hold about you. 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.
- **object to processing** of any personal data that we may hold about you 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.
- **request restriction of processing** of any personal data that we may hold about you. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **request a transfer** to you or to a third party of any personal data that we may hold about you. 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.
- **withdraw consent at any time** where we are relying on consent to process any personal data that we may hold about you. 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.

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

14. Governing Law

This privacy policy is governed by English law.