

MiTek Mezzanine Systems Limited understands that your privacy is important to you and that you care about how your personal data is used.

#### In this privacy policy:

- 'we', 'us' or 'our' refers to MiTek Mezzanine Systems Limited;
- 'the site' means the MiTek Mezzanine Systems Limited website you are visiting or engaging with; and
- 'you' and 'your' means you, the person engaging with us or visiting our site.

We respect and value the privacy of everyone who visits the site and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of the site or you will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using the site immediately.

## **1. Definitions and interpretation**

In this Policy the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of the site;  
"Cookie" means a small text file placed on your computer or device by the site when you visit certain parts of the site and/or when you use certain features of the site. Details of the Cookies used by the site are set out in Part 14, below.

## **2. Information about us**

The site is owned and operated by MiTek Mezzanine Systems Limited, a limited company registered in England under company number 2642480.

#### **Main trading address:**

MiTek Mezzanine Systems Limited  
11 Tower View  
Kings Hill, West Malling  
Kent, ME19 4UY  
United Kingdom

Email address: [mezzanine-UK@mii.com](mailto:mezzanine-UK@mii.com)

## **3. What does this policy cover?**

This Privacy Policy applies only to your use of the site. The site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## **4. What is personal data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## **5. What are my rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or

for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 6. What data do we collect?

If you, for example:

- register;
- search for a service;
- place an order for a brochure or other materials;
- enter a survey;
- post content;
- communicate with any third party; or
- report a problem with any of the Websites,

on the site, some or all of your personal information (including your name, job title, job function, company's name, telephone, fax and mobile numbers, postal and email address, the industry you work in and your area of interest) may be collected by Mezzanine International Limited. We also collect personal information from you when you contact us (by email or otherwise).

Please also see Part 14 on our use of Cookies and similar technologies.

## 7. How do you use my personal data?

**Under the GDPR**, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your Account;
- Providing and managing your access to our site;
- Personalising and tailoring your experience on our site;
- Supplying our products or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products or services for you.
- Communicating with you. This may include responding to emails or calls from you. Supplying you with information by email or post (you may unsubscribe or opt-out at any time by contacting [mezzanine-UK@mii.com](mailto:mezzanine-UK@mii.com))
- Analysing your use of the site and gathering feedback to enable us to continually improve our site and your user experience.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or telephone or text message or post with information, news, and offers on our products or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties whose content appears on our site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

## 8. How long will you keep my personal data?

We will not retain your personal information longer than necessary. We will hold onto the information you provide either while your account is in existence, or as needed to be able to provide the Services to you, or for as long as is necessary to provide support-related reporting and trend analysis only.

If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your information for a limited period of time as required, even after you have closed your account, or it is no longer needed to provide the Services to you.

## **9. How and where do you Store or Transfer My Personal Data?**

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the European Commission.

## **10. Do you share my personal data?**

We will also share your personal information with selected third parties including business partners, suppliers and sub-contractors for the performance of any contract it enters into with them or you, and/or, to the extent you have consented, advertisers and advertising networks that require your data to select and serve relevant adverts to you and others.

In some limited circumstances, we may be legally required to share certain personal data, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **11. How can I control my personal data?**

→ In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via the site, you may be given options to

restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails or at the point of providing your details).

→ You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## **12. Can I withhold information?**

You may access certain areas of the Site without providing any personal data at all. However, to use all features and functions available on the Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

## **13. How can I access my personal data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. The Company does not charge an administration fee for the handling of normal Subject Access Requests. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of

your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### 14. Cookie policy

We make use of cookies to gather valuable information about how users move around the site. This enables us to understand how the site is used and to make improvements. The information we gather by use of cookies does not include personally identifying information.

Two of the cookies we use are essential for parts of the site to operate and will have already been set. You may delete and block all cookies from this site, but please note that parts of the site may not work.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit:

[tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

#### Access to data

You have the right to be told what personal information we hold about you on our databases.

You should write to us at our Head Office stating your full name and your address. A small administrative charge will be made for fulfilling this request.

#### Your Acceptance of These Terms

By using this site, you signify your assent to this Privacy Policy. If you do not agree to the terms of this policy, please do not use this site. We reserve the right, at our discretion, to change, modify, add, or remove portions of this policy at any time. Please check this page periodically for changes. Your continued use of this website following the posting of changes to these terms will mean that you accept those changes.

| Cookie                 | Name   | Purpose   | More information   |
|------------------------|--|---|--|
| Essential site cookies | mezzaninesettings<br>mezzaninesession<br>cookiesOK | These cookies are essential to maintain your session throughout your visit to this site and remember choices such as your preferred language.   |  |
| Google Analytics       | _utma<br>_utmb<br>_utmc<br>_utmz                   | These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. | Visit the Google Privacy Policy here:<br><a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a> |

## **15. How do I contact you?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [mezzanine-UK@mii.com](mailto:mezzanine-UK@mii.com)

Telephone: 01732 849 900

Postal Address:

MiTek Mezzanine Systems Limited

11 Tower View

Kings Hill

West Malling

Kent

ME19 4UY

United Kingdom.

## **16. Changes to this privacy policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our site following the alterations. We recommend that you check this page regularly to keep up-to-date.

**Date:** November 2020