

## **ATL PRIVACY POLICY**

Aero Tec Laboratories Limited ("We") of ATL Technology Centre, Denbigh Road, Bletchley, Milton Keynes MK1 1DF are committed to protecting and respecting your privacy – referred to hereafter as "ATL". Any reference to "you" or "your" means you, the user.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

ATL respects your privacy and is committed to protecting the personal information you share with us. For the purpose of the Data Protection Act 1998 and Privacy and Electronic Communication Regulations, the General Data Protection Regulations 2016 and any and all other applicable laws and regulations relating to the processing of personal data and privacy ("the Data Protection Legislation"), we act as the data controller.

This policy relates to and covers all aspects of contact, including, existing and prospective employees, customers, suppliers and third parties.

Our nominated representative for the purposes of the Data Protection Legislation is Giles Dawson, whose contact details are ATL Technology Centre, Denbigh Road, Bletchley, Milton Keynes MK1 1DF, Tel: +44 (0) 1908 351700.

### **1. Information we collect from you**

1.1 We will collect and process the following data about you:

- 1.1.1 Information about you that you give us by filling in forms on our site [www.atlltd.com](http://www.atlltd.com) (our website) or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, address, e-mail address and phone number, gender and date of birth;
- 1.1.2 If you contact us, we may keep a record of that correspondence;
- 1.1.3 If you complete surveys that we use for research purposes or to measure customer satisfaction (although for the avoidance of doubt you do not have to respond to such surveys), the information which you provide in response to that survey;
- 1.1.4 Technical information regarding your visits to our site including, but not limited to, the Internet protocol (IP) address used to connect your computer to the Internet, geographical location, browser type and version and time zone setting;
- 1.1.5 Information about your visit, including the full Uniform Resource Locators (URL) and products you viewed or searched for;
- 1.1.6 Information provided through engagement with ATL Social Media platforms;
- 1.1.7 Where credit card information is provided for payment by any means it will be destroyed immediately.

### **2. IP addresses and Cookies**

- 2.1 We may collect information about your computer, including, where available, your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual;
- 2.2 ATL's website ([www.atlltd.com](http://www.atlltd.com)) does collect cookies for analytical purposes, consent is required by site users upon landing.

### **3. How we use your personal data**

- 3.1 In order for us to perform our contract with you and/or where we have legitimate interests in doing so, we may collect and process the information held about you for the purposes specified:
  - 3.1.1 To carry out our obligations arising from any product enquiry or request for quotation place upon ATL and to provide you with the information, products and services that you otherwise request from us;
  - 3.1.2 To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

- 3.1.3 To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you, where you have consented to be contacted for such purposes;
- 3.1.4 To notify you about changes to our products or services as well as update you regarding news surrounding regulatory changes or requirements relevant to your ongoing dealings with ATL;
- 3.1.5 To allow us to process and evaluate your application or curriculum vitae ("CV") in respect of any employment opportunity that you have applied for;
- 3.1.6 To ensure that content from our site is presented in the most effective manner for you and for your computer;
- 3.1.7 To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 3.1.8 To improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- 3.1.9 As part of our efforts to keep our website safe and secure; and
- 3.1.10 Ensuring compliance with any regulatory obligations placed upon us by any Industry or Governing Body.

#### 4. Special categories of personal or criminal records data

- 4.1 Special categories of data includes information about an individual's race, ethnic origin, political views, trade union memberships, genetics, biometrics, health, sex life and sexual orientation. Criminal records data will be treated in the same regard with the additional safeguards applied in accordance with Article 10 of the General Data Protection Regulations.
- 4.2 Processing special category data will be conducted in accordance with Article 9(2) of the General Data Protection Regulations.
- 4.3 ATL may process the data defined in clause 4 to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

#### 5. Providing your personal data to others

- 5.1 We may share your personal information with:
  - 5.1.1 Any business under common ownership of ATL, insofar as reasonably necessary for the purposes set out in this policy.
  - 5.1.2 Selected third parties including:
    - 5.1.2.1 Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; and
    - 5.1.2.2 Any Industry or Governing Bodies upon reasonable request for legitimate reason (ie. product traceability in the event of any product recall).
  - 5.1.3 We will disclose your personal information to third parties:
    - 5.1.3.1 In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets as part of the sale or purchase process and to allow this transaction to proceed;
    - 5.1.3.2 If ATL or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
    - 5.1.3.3 If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply and other agreements; or to protect the rights, property, or safety of ATL, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### 6. Where we store your personal data and international transfers of your data

- 6.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details

and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

- 6.2 Our owners have offices and facilities in the USA. Transfers to the USA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- 6.3 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 6.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 7. Retaining and deleting personal data

7.1 We shall ensure that any personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. For details or retention periods applying to any type of personal data please contact the nominated representative detailed in this policy. All records are contained within our Data Retention Policy.

## 8. Recruitment

8.1 This section is relevant to the personal data of job applicants, potential candidates for employment only. We will process your data in accordance with this privacy notice.

8.2 Personal data may be captured directly from you when you apply for a role with us, such as your name, address, contact information, work and educational history and test results. We also may collect personal data about you from third parties, such as professional recruiting firms and employment background check providers, to the extent this is permitted by applicable law.

8.3 Sensitive personal data is defined under clause 4. We do not seek to obtain and will not collect such data about a candidate unless permitted to do so by applicable laws (e.g., equal opportunity monitoring).

8.4 We collect and use your personal data for legitimate human resources and business management reasons including:

- 8.4.1 identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- 8.4.2 recordkeeping in relation to recruiting and hiring;
- 8.4.3 ensuring compliance with legal requirements, including diversity and inclusion requirements and practices;
- 8.4.4 conducting criminal history checks as permitted by applicable law;
- 8.4.5 protecting our legal rights to the extent authorised or permitted by law; or
- 8.4.6 emergency situations where the health or safety of one or more individuals may be endangered.

## 9 Your rights

- 7.1 You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes. You can exercise your right to prevent such processing by not checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at Aero Tec Laboratories Limited, ATL Technology Centre Denbigh Road, Bletchley, Milton Keynes, MK1 1DF.
- 7.2 You can exercise the right to request any amendments or rectifications to your personal data by contacting us at the above address and can use this address to notify us if you would like us to delete your data.
- 7.3 Our website may, from time to time, contain links to and from external websites as a service to our visitors. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. The provision of a link on our site to an external website should not be taken as an endorsement by us of that external website, its owners or their products / services.

## 8. Access to information

The Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Legislation by contacting us at Aero Tec Laboratories Limited, ATL Technology Centre Denbigh Road, Bletchley, Milton Keynes, MK1 1DF.

## 9. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## 10. Complaints

If you are unhappy with the way in which we have collected or processed your personal data or have any other complaint in relation to our handling of your personal data, you can make a complaint to the Information Commissioner. Further information can be found on the Information Commissioner's website at [www.ico.org.uk](http://www.ico.org.uk) or via their helpline on 0303 123 1113.

## 11. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Aero Tec Laboratories Limited, ATL Technology Centre Denbigh Road, Bletchley, Milton Keynes, MK1 1DF.