
Privacy policy

(How Castell Safety International Limited uses your information)

1 Who we are

Castell Safety International Limited, (Castell, we) is a company incorporated in England and Wales with registered number 1514709.

Our contact details are as follows:

Address: Castell, The Castell Building, 217 Kingsbury Road, London NW9 9PQ

Telephone: 020 8200 1200

If you have any queries about this notice or Castell's data protection compliance measures, please contact us at accounts@castell.com.

2 How we collect your personal data and why

Castell Safety International Limited may need to collect personal data about you and there are different ways that we might do so; this privacy notice outlines what to expect when we collect personal data on:

- (a) Visitors to our website, <http://www.Castell.com/>
- (b) anyone who interacts with us or contacts us through Social media
- (c) anyone contacting us, by phone, email and other methods.

Under data protection legislation we are only permitted to use your personal data if we have a legal basis for doing so as set out in the data protection legislation.

In sections 2.2 – 2.3 below, we will specify one of following legal bases for each usage of your personal data:

- Where we need information to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation; or
- Where we need your information because it is in our legitimate interests (or those of a third party) to use it and your interests and fundamental rights do not override those interests.

2.1 Visitors to our website

Our websites, <http://www.Castell.com/> and <http://www.salvosafe.com> are hosted by AR Hostings. As part of our web service we will maintain the security and the performance of our websites by (i) protecting user connections (ii) using third party scanning services to scan against known web attacks (iii) investigating site errors and (iv) providing secure hosting services.

In using our website, you will submit your personal data that we require, because it is in our legitimate interest. It is in both of our interests to process this personal data to help manage our websites and allow us to comply with your marketing requests, which we explain in more detail in sections 2.1.1 and 2.1.2 below.

2.1.1 Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our websites on the basis that it is in our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our websites, which allows us to provide you a better experience and also allows us to improve our websites.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies. However, if you do block cookies there may be parts of our websites that you will be unable to access or that will not function properly.

Our cookies help to:

- make our websites work as you would expect;
- remember your settings during and between visits;
- improve your and other users' experiences of the websites;
- remembering if we have already asked you certain questions; and
- improve the speed/security of our websites.

For more information about cookies and how we use them, please see our cookies policy.

2.1.2 Third party services

Whenever you visit our websites, <http://www.Castell.com/>, a third party service, Google Analytics is used, on the basis that it is in our legitimate interest, to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we use this service is so that we can find out how many people visit the websites and the various parts of the websites. This information is necessary because it helps us to find out how our websites are working and how to improve it. We do

not identify anyone, and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our websites.

2.2 Social media

Our websites contain links to our social media pages. Any information you provide to us via social media (including messaging, "liking", "following" and other communications) is controlled by the social media network. We currently use:

- a) Facebook, which has its own privacy notice that can be located at <https://www.facebook.com/privacy/explanation>;
- b) LinkedIn, which has its own privacy notice that can be located at <https://www.linkedin.com/legal/privacy-policy>;
- c) Twitter, which has its own privacy notice that can be located at <https://twitter.com/en/privacy>;
- d) Instagram, which has its own privacy notice that can be located at <https://help.instagram.com/155833707900388>.

2.3 Contacting us

Our websites provide you with different ways to contact us. All communications are handled, reviewed and responded to internally by us.

Please note, however, that:

- (a) email monitoring or blocking software may also be used and that you have a responsibility to ensure that any email you send to us is within the bounds of the law;
- (b) we use Salesforce to store contact information for all of our customers and people who contact us, we will only use this information to contact you to respond to your queries or requests

As part of communicating with us, you will also submit personal data about you that we require. We collect this information on the basis that it is in our legitimate interest to do so. This includes your name, address, additional contact details and details about your query. It is in both our and your interest for us to process this information so we can deal with your query effectively.

Any personal data that is provided in and during communications with us is used only for the purpose of reviewing the communications and conducting the ongoing administration and management of communications. We will not use your personal data in an identifiable manner in any publication without your further explicit consent.

We will delete this personal data when we reasonably consider that we no longer need it for this purpose.

Please note that we may need to contact you about your enquiry through email or telephone. Please make sure that you keep us updated of any changes to your contact details.

3 Disclosure of personal data

We will not usually disclose your personal data other than as already explained in Section 2 above. However, there may be circumstances where we need to share personal data other than as anticipated in Section 2 above. These include:

- 3.1.1 where we are legally required to disclose the information. This includes sharing the personal data with tax authorities and law enforcement agencies for the purposes of the prevention and detection of crime;
- 3.1.2 where we need to disclose the personal data for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;
- 3.1.3 disclosure is required to protect our interests, or someone else's interests (for example, to prevent fraud);
- 3.1.4 disclosure is necessary to protect your vital interests (for example if you are unwell at our premises, we may need to seek medical assistance);
- 3.1.5 to any prospective purchaser of our business assets or organisation.

4 Keeping personal data secure

We know that you provide your personal data in good faith and expect it to be looked after. This is why we take the security of your personal data seriously. This means that we have taken steps internally in order to ensure that our systems adequately protect your personal data. This includes:

- (a) locating all personal data that we control on internal servers located in the United Kingdom;
- (b) ensuring strict access controls on a need to know basis;
- (c) monitoring access to the personal data; and

5 Your rights

You have rights in respect of your personal data and this Section explains a bit more about those rights that are applicable to what we do with your personal data and when you can exercise them. If you would like more information about any of your rights, please contact us on the contact details set out above

5.1 Accessing your personal data

We want you to fully understand and be comfortable with how we use your personal data. You can contact us at any time to ask whether we process any personal data about you. If we do hold or use your personal data in any way, you have the right to access that personal data. All we ask is that:

- 5.1.1 you make your request to access in writing to the contact details set out above;
- 5.1.2 you verify your identity; and
- 5.1.3 you are fair and reasonable with how often you make this kind of request. Please allow us up to one month from receipt of your request in order to provide a response.

5.2 Requesting more information

it is difficult to cover all the possible ways in which we collect and use personal data. We have tried to be as clear and as open as we can and will continue to update this privacy notice as our use of personal data develops. However, if you have any questions regarding our use of your personal data, we will be happy to give you peace of mind by answering any questions or providing any additional information that we can. If you do have any questions, please get in touch on the contact details set out above.

5.3 Additional rights

From 25th May 2018, you also have some additional rights that you may exercise as set out here. We may publish a policy, from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will provide a link to it here. In each instance we may ask you to make your request in writing to the contact details set out above and provide verification of your identity.

- 5.3.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address)
- 5.3.2 You have the right to request that we erase your personal data. Please be aware that we can only comply with such a request if:
 - (a) your personal data is no longer required for the purposes it was collected for (for example, we need your personal data to respond to a communication);
 - (b) the collection, storage or use of the personal data by us is prevented by law; and
 - (c) your personal data is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings.
- 5.3.3 You have the right to request that we restrict or refrain from processing your personal data:

- (a) for the time it takes us to verify the accuracy of your personal data where you have disputed its accuracy;
- (b) where the collection, storage or use of the personal data by us is unlawful but you decide not to ask for erasure;
- (c) where we no longer need your personal data but you need them for the purposes establishing, exercising or defending a legal claim; and
- (d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal data, where you have exercised your right to object to processing.

5.3.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.

5.3.5 You have the right to object to our use of your personal data:

- (a) where we are using that information on the basis that it is in our legitimate interests to do so, and where we do not have compelling overriding grounds to continue to use your personal data; or
- (b) at any time, where we use your personal data to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose but may use it for another lawful purpose.

6 Complaints

You are important to us, as is protecting your personal data. We have high standards when it comes to collecting and using personal data. For this reason, we take any complaints we receive from you about our use of your personal data very seriously and request that you bring any issues to our attention. Where you are communicating with us for the purpose of making a complaint, we will only use your personal data to handle, investigate and respond to the complaint and to check on the level of service we provide. Where the complaint is about a member of our team, we may have to disclose your identity to whoever the complaint is about. You may let us know that you don't want information that identifies you to be disclosed and we will try to respect your request; however, it may not be always possible to handle a complaint on an anonymous basis. If you are unhappy, you can also contact the Information Commissioner's office to make a complaint directly, the link to the ICO's website is <https://ico.org.uk/global/contact-us/>.