

# Privacy Policy Privacy & GDPR

# Synthotech Privacy Policy

## Privacy and GDPR

This policy is provided by Synthotech and is addressed to individuals with whom we interact including visitors to our website/s, customers, and suppliers.

For the purposes of this Privacy policy, Synthotech is the Data Controller.

Synthotech is committed to protecting your privacy and to developing technologies that provide a safe and secure experience for your data.

In general, we will ask you when we need information that personally identifies you or allows us to contact you. For example, personal information may be requested when you are requesting information on a product or service, ordering products or services, or when registering for Synthotech events.

This policy will be amended or updated from time to time to reflect changes in our practices with respect to the processing of personal data, or changes in applicable law. We encourage you to read this policy carefully, and to regularly check this document to review any changes we might make in accordance with the terms of this policy.

### Use of Your Personal Information

The personal information we collect from you will be used by Synthotech to provide the service or carry out the transaction you have requested or authorised. This may include using the personal information for the following purposes:

- To provide you with important information about the product or service that you are using, including critical updates and notifications;
- To improve the product or service and to provide better customer service.

### **Synthotech does not give, sell, rent, or lease its customer lists to third parties.**

Synthotech may disclose personal information if required to do so by law or in the good faith that such action is necessary to:

1. conform to the requirements of the law or comply with legal process served on Synthotech or the website;
2. protect and defend the rights or property of Synthotech, and,
3. act in urgent circumstances to protect the personal safety of Synthotech, its websites, or the public.

The amount of personal information you are required to supply will be limited to that which is necessary to supply the service or carry out the transaction that you have requested. Any other information being requested will be labelled as optional.

Personally identifiable information (PII) collected by Synthotech may be stored and processed in UK or any other country in which Synthotech or its affiliates, subsidiaries, or agents maintain facilities. It will be password secured and access to the PII will only be granted to Synthotech colleagues who need access to undertake lawful activities.

## Accessing Your Personal Information

All outbound emails will feature instructions on how to Opt-in/Opt-out of communication services or stop communications altogether.

## Processing your Personal Data

We may collect personal data about you, such as your name, address, and contact details etc.

We may rely on one or more of the following justifications for processing this data, depending on the circumstances:

- We have obtained your prior express consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way);
- The processing is necessary in connection with any contract that you may enter into with us;
- The processing is required by applicable law;
- The processing is necessary to protect the vital interests of any individual; or
- We have a legitimate interest in carrying out the processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.
- Examples of sources from which we may collect data include the following:
  - Obtaining your personal data when you provide it to us (for example, when you contact us via our website, email, telephone, or by any other means).
  - Receiving your personal data from third parties, to the extent that it can be lawfully provided to us.

## Creation of Personal Data

We may also create personal data about you such as events you have attended, or previous orders you have placed.

In some circumstances, you may provide us with personal data about others (e.g., when participating at events, or providing feedback to us). Whenever you provide any such personal data, we rely on you to ensure that you have a lawful basis for providing such personal data to us, and that you have complied with applicable law and with the

terms of this policy. If you are unable to do so, please refrain from providing the personal data of third parties to us.

## How we will use your Personal Data

The purposes for which we may use your personal data, subject to applicable law, include:

- Provision of products or services to you: providing related services to you; providing relevant materials to you; inviting you to relevant events and discussions; and otherwise communicating with you in relation to those services.
- Management of relationships: managing relationships with our customers; resolving disputes and other related administrative functions.
- Marketing communications: communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items and other information in which you may be interested, subject to ensuring that such communications are provided to you in compliance with applicable law.
- Communications and IT operations: management of our communications systems; operation of IT security; and IT security audits.
- Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.
- Financial management: sales; finance; business audit; and supplier management.
- Surveys: engaging with you for the purposes of obtaining your views on relevant issues and topics.
- Improving existing products and services.
- Creating new products and services

## Disclosure of Personal Data to third parties

We may disclose your personal data to:

- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, lawyers and other outside professional advisors to Synthotech, subject to binding contractual obligations of confidentiality;
- third party Processors (such as providers of payment processing services), located anywhere in the world. If we engage a third-party Processor to process your personal data e.g.; outbound emails, newsletter distribution etc. the Processor will be subject to binding contractual obligations to:

- only process the personal data in accordance with our prior written instructions; and
  - use measures to protect the confidentiality and security of the personal data; together with any additional requirements under applicable law.
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security;

## Data Retention

The criteria for determining the duration for which we will keep your personal data are as follows: we will retain copies of your personal data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this policy, unless applicable law requires a longer retention period. In particular, we may retain your personal data for the duration of any period necessary to establish, exercise or defend any legal rights.

## Security of Your Personal Information

Synthotech protects the security of the personal information you provide. When sensitive personal information is transmitted over the Internet, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

## Contact Information

At Synthotech, your privacy is very important to us. Our privacy principles represent our commitment to ensuring that your personal information is safe and secure.

If you believe that Synthotech has not adhered to these policies, please contact us by email, telephone, or postal mail and we will engage all reasonable efforts to promptly identify and remedy the problem.

e: [info@synthotech.co.uk](mailto:info@synthotech.co.uk)

t: 01423 816060

Synthotech Limited  
Milner Court  
Hornbeam Square South  
Hornbeam Park  
Harrogate  
HG2 8NB

Updated – 11<sup>th</sup> August 2021



1. We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer employment. We may also need to process data from job applicants to respond to and defend legal claims.
2. We may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out our obligations and exercise specific rights in relation to employment.
3. If your application is unsuccessful, Synthotech Ltd may keep your personal data on file for future employment opportunities which you may be suited. We will ask for your consent before we keep your data for this purpose, and you are free to withdraw your consent at any time.

## Who has access to your data?

1. Your information may be shared internally for the purposes of the recruitment process. This includes members of the HR and Management Team, interviewers involved in the recruitment process and senior staff members in the business area with a vacancy.
2. We will not share your data with third parties, unless your application for employment is successful and we make you a formal offer of employment. We may then share your data with your former employers to obtain references for you and employment background check providers to obtain any necessary background checks.

## How does Synthotech Ltd protect data?

1. We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

## How long does Synthotech Ltd retain data?

1. If your application for employment is unsuccessful, we will hold your data on file for 6 (six) months after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 6 (six) months for consideration for future employment opportunities. At the end of the period, or once you withdraw your consent, your data is deleted or destroyed. You will be asked when you submit your CV whether you give us consent to hold your details for the full 12 months in order to be considered for other positions.

2. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment.

## Your rights

As a data subject, you have a number of rights. You can:

1. access and obtain a copy of your data on request;
2. require the organisation to change incorrect or incomplete data;
3. require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
4. object to the processing of your data where Synthotech Ltd is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Fiona Bradley at [HR@synthotech.co.uk](mailto:HR@synthotech.co.uk)

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Synthotech Ltd during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

## Identity and contact details of controller and data protection office

1. Synthotech Ltd is the controller and processor of the data for the purposes of DPA and GDPR.
2. If you have any concerns as to how your data is processed, you can contact

Mark Tindley, Managing Director, Synthotech Ltd, [HR@synthotech.co.uk](mailto:HR@synthotech.co.uk)



# Synthotech

`taking responsibility seriously`

Synthotech is a small company that does big business. We take our responsibilities seriously and as such are very proud that we have the following third party certifications, operating policies and procedures that allow us to operate in a manner that keeps our colleagues, and all stakeholders including customers, suppliers and third parties safe and secure in our environment, and theirs.



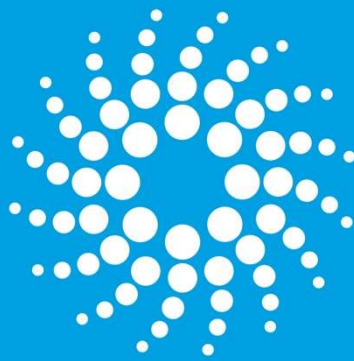
Synthotech is a Carbon Neutral company, offsetting its operational carbon each year in renewable carbon negative projects.



Synthotech are proud to be a Living Wage Employer



Synthotech are Cyber Essentials certified



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