

# Privacy and Security Policy

dated 25 May 2018 (version no. 6 of April 14, 2022)

Dear User,

The website: **www.rawlplug.co.uk, www.rawlplug.com/en/rawlplug-academy/training-centre/, www.rawlplug.com/ru/rawlplug-academy/training-centre/, www.rawlplug.com/pl/rawlplug-academy/training-centre/, www.rawlplug.com/fr/rawlplug-academy/training-centre/** (the "Website") is provided by **Rawlplug Ltd, 21 Holborn Viaduct, London, United Kingdom**(Rawlplug) as a service to its customers, unless specifically provided otherwise on a Website. Rawlplug is committed to protecting your online privacy and secure all important information you provide to us. Any personal data Rawlplug collects will be used in accordance with applicable laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR).

## 1. WHO IS THE CONTROLLER?

Any personal data collected via the Website are controlled by Rawlplug.

You may contact us at any time in relation to personal data of yours processed by us.

Contact details of controller: **Rawlplug Ltd, 21 Holborn Viaduct, London, United Kingdom**, [✉ gdpr.uk@rawlplug.com](mailto:gdpr.uk@rawlplug.com)

On the website **gdpr.rawlplug.com** you will find details on processing of your personal data by us; protection and security measures implemented by us, and information on your rights and their enforcement.

Rawlplug is a part of a Rawlplug Group which is a holding of companies for which RAWLPLUG S.A. with its registered office in Wrocław, Poland (VAT EU: 895-168-78-80) is the dominant company on the grounds of Statute on Accounts dated on 29 September 1994 (unified text Dz.U.2019.351 as amended from time to time), comprising of following companies:

- **Rawlplug S.A.**, Kwidzyńska 6, 51-416 Wrocław, Poland;
- **Koelner Rawlplug IP sp. z o.o.**, Kwidzyńska 6, 51-416 Wrocław, Poland;
- **Rawlplug Italia s.r.l.**, Via Savonarola 217 Padova cap 35137, Italy
- **Rawlplug Ltd**, Skibo Drive, Thornliebank Industrial Estate, Glasgow G46 8JR, Wlk. Brytnia;
- **Koelner Deutschland GmbH**, Lutherstr. 54, 73614 Schorndorf, Germany;
- **Rawlplug France SAS**, , Bâtiment DC6, ZAC de la Feuchère 16, rue Jean Mermoz, 77290 COMPANS, France;
- **Rawlplug Middle East FZE**, P.O. Box 261024, Jebel Ali Free Zone, Dubai, ZEA;
- **Rawlplug Building & Construction Material Trading (L.L.C.)**, Al Qouz Industrial Area 3, 22 ND Street, Compound 81, P. O. Box 261024 Dubai, ZEA;
- **Rawl Scandinavia AB**, Baumansgatan 4, 593 32 Västervik, Sweden;
- **Rawlplug Ireland Ltd**, Unit 10 Donore Business Park, Donore Road Drogheda,

- Co Louth, Ireland;
- **Koelner CZ s.r.o.**, Komerční Park Tulipan, Palackého 1154/76A (hala T3), 702 00 Ostrava-Přívoz, Czech Republic;
  - **KOELNER Slovakia s.r.o.**, Dlhá 95, 010 09 Žilina, Slovakia;
  - **Koelner Hungária Kft.**, Jedlik Ányos u. 34, 2330 Dunaharaszti, Hungary;
  - **UAB Koelner Vilnius**, Žarijų g. 2, LT-02300, Vilnius, Lithuania;
  - **Koelner Ukraine LLC**, vul. Naukova 3a, 79060 Lviv, Ukraine;
  - **Koelner Trading KLD LLC**, ul. Dzerzhinskogo 219, 236034 Kaliningrad, Russia;
  - **Rawlplug Singapore Pte. Ltd.**, 25B, Loyang Crescent, Block 302, #04-11, Loyang Offshore Supply Base, Singapore 506817 #05-34, Singapore;
  - **Rawlplug Shanghai Trading Co. Ltd.**, 1/F, Building 1 No.251 Yaohua Rd, Shanghai Free Trade Zone, China;
  - **Rawlplug Inc.**, Trust Center 1209 Orange St. New Castle, Delaware DE 19801, USA.

hereafter referred to as “Rawlplug Group”.

## **2. DATA THIS POLICY APPLIES TO.**

This policy applies to information, including personal data, Rawlplug collects:

- on this Website.
- in email, text, and other electronic messages between you and this Website.
- through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- when you interact with Rawlplug’s advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Rawlplug offline or through any other means, including on any other website operated by Rawlplug or any third party (including Rawlplug’s affiliates and subsidiaries); or
- any third party (including Rawlplug’s affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand Rawlplug’s policies and practices regarding your information and how Rawlplug will treat it. If you do not agree with Rawlplug’s policies and practices, your choice is not to use the Website. Accessing or using this Website requires your expressed consent to this privacy policy and processing of the personal data submitted during the use of the Website. As stated in Section 12 therein this policy may change from time to time. Any such change requires your expressed acceptance. You may withdraw your consent by checking respective box in a window at the bottom of the Website. Withdrawal of your consent precludes you from using the Website anymore, however any processing by Rawlplug of any of personal data submitted by you prior to the withdrawal of your consent is valid and in force.

The term ‘personal data’ as used herein comprises any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## **3. CHILDREN UNDER THE AGE OF 16**

The Website is not intended for children under 16 years of age. No one under age 16 may provide any personal data to or on the Website. Rawlplug does not knowingly collect

personal data from children under 16. If you are under 16, do not use or provide any information on this Website or on or through any of its features, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any personal data to Rawlplug, including your name, address, telephone number, email address, or any screen name or user name you may use. If Rawlplug learns it has collected or received personal data from a child under 16 without verification of parental consent, Rawlplug will delete that information. If you believe Rawlplug might have any personal data about a child under 16, please contact Rawlplug.

## **4. INFORMATION RAWLPLUG COLLECTS**

Rawlplug will not collect personal data about you, except where it is specifically and knowingly provided by you, including through the use of this Website. Rawlplug may collect other information it learns about you from your use of the Website. As such Rawlplug may collect and process the following personal data about you:

- contact and identification information: name, surname, address, telephone number, email address, date of birth, tax number and any identification number (such as number of ID document),
- payment information: name and surname of a card holder, payment card number and expiration date, bank account number.
- data provided through any forms available on the Website, such as data required to create an user-account, purchase the products and/or services offered by Rawlplug, newsletter subscription, publishing of an information. Rawlplug may ask you to provide additional information if you are willing to participate in promotional actions or communicated problems with the Website.
- login and access credentials: username and password for your account on the Website, or social media identifications.
- data Rawlplug receives from the computer, mobile phone or other device you use to access the Website: IP address, location and time.
- data Rawlplug receives when you interact with the Website: posted content, photographs.

Rawlplug may also collect other information, other than personal data, such as the contact and business details of organization entity you represent, browser you use, your operating system or the pages you visit, information received when you view another person's profile or post content etc.

Rawlplug collects this information, including personal data:

- directly from you when you provide it to Rawlplug.
- automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, location and information collected through cookies, web beacons, and other tracking technologies.

Personal data collected for purposes other than compliance with legal obligation may be subject of profiling, which is an automated processing of personal data to analyse or predict aspects concerning your personal preferences or behaviour (for example, to personalize the Website or marketing content sent to you).

The information Rawlplug collects will also be used to help us review, develop and improve the products and services Rawlplug offers.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although, please be aware that no security measures are perfect or impenetrable. Additionally, Rawlplug cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, Rawlplug cannot and do not guarantee that your User

Contributions will not be viewed by unauthorized persons.

Any publication of a photograph on the Website containing your image, constitutes a consent to use such image by Rawlplug on the Website (for example, avatar).

Rawlplug may request additional personal information to provide certain services available on the Website. If such personal data are not provided by you, Rawlplug will not be able to provide you requested services.

Rawlplug may collect your personal data for operating Rawlplug ID, of which you will be informed on the Website. Rawlplug ID is (i) a system of coherent and joint signing-on, so called "single sign-on" or SSO, to Rawlplug's services and functionalities available online allowing Rawlplug ID's registered users (as a result of registering an account on any Rawlplug's website or Rawlplug ID's dedicated website) to secure signing-on to other Rawlplug's services or websites online which require registered user account, or (ii) a data base of your personal data if you use our online services without registering an user account.

Rawlplug ID records personal data which are necessary for Rawlplug to provide online services through the Website, as well as to perform other contracts, which have been concluded by you through the Website. Information on services and contract you will find on the Website or on other dedicated Rawlplug websites. Rawlplug ID also allows you to manage your personal data and contracts you have concluded with Rawlplug through Rawlplug ID as well as enforcing your rights under GDPR.

## **5. INFORMATION RAWLPLUG COLLECTS THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES**

As you navigate through and interact with the Website, Rawlplug may use automatic data collection technologies to collect certain information, including personal data, about you, your equipment, browsing actions, and patterns, including:

- Details of your visits to the Website, including traffic data, location data logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

It helps Rawlplug to improve the Website and to deliver a better and more personalized service, including by enabling Rawlplug to:

- Estimate its audience size and usage patterns.
- Store information about your preferences, allowing us to customize the Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the Website.

## **6. COOKIES**

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit. Cookies are useful because they allow a website to recognize a user's device. You can find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences (for example language choice), and generally improving the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

Cookies are referred to as session or persistent, depending on how long they are stored on your computer or device:

- Session cookies only last for the length of your online session. They disappear from your computer or device when you close your browser.
- Persistent cookies stay on your computer or device after the browser has been closed and last for a set period of time specified in the cookie. These cookies are activated each time you visit the site that generated the cookie.

Rawlplug does not use cookies with the aim of collecting commercial data for sale to third parties.

### **Performance cookies**

Performance cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

The Website currently uses few types of performance cookies including Google Analytics.

Google Analytics is a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate Rawlplug's use of the Website and compiles reports on user activity. Google stores the information collected by the cookie on servers in the United States and other countries. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using the Site, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

The use of these cookies requires your express consent, which you can express through the options of the Website (cookie banner) or in the options of the web browser used, or you can opt out of them on the Google Analytics website:

<http://tools.google.com/dlpage/gaoptout>

Rawlplug also uses cookies for additional purposes, including:

- Identifying you when you sign-in to the Website. This allows Rawlplug to provide you with product recommendations, display personalized content, recognize you as a prime member (if applicable), and enable you to use special features in purchasing, among other customized features and services Rawlplug provides.
- Keeping track of your specified preferences. You may generally exercise your preferences through your account.
- Keeping track of items stored in your shopping basket.
- Preventing fraudulent activity.
- Improving security.
- Direct marketing of own product

### **Functional cookies**

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. They may also be used to provide services you have asked for such as watching a video. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

### **Managing cookies in your browser**

Modern browsers allow you to perform a number of tasks in relation to cookies including the ability to view the cookies currently stored on your computer or device and delete them on an individual basis, block third party cookies, block cookies from particular sites, prevent all cookies from being set and delete all cookies when you close your web browser.

You should note that any individual preferences will be lost if you delete cookies, including a preference to opt out of cookies (since this requires an opt-out cookie to be set). If you choose to block cookies completely, many websites will not work properly and some functionality may be lost.

The links below take you to the relevant 'Help' sections for the major web browsers. Here you will be able to find out more information about how to manage your cookies.

**Internet Explorer:**

<https://support.microsoft.com/en-us/help/278835/how-to-delete-cookie-files-in-internet-explorer>

**Firefox:**

<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

**Google Chrome:**

<https://support.google.com/chrome/answer/95647?hl=en>

**Opera:**

<https://help.opera.com/en/presto/browser-behavior/#cookies>

**Safari:**

<https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

**Safari iOS:**

<https://support.apple.com/en-gb/HT201265>

**Android:**

<https://support.google.com/chrome/answer/95647?hl=en>

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Website. The information they collect may be associated with your personal data or they may collect information, including personal data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

Rawlplug does not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## **7. USE OF INFORMATION**

Rawlplug will use your information to provide and personalize the Website. Rawlplug may also use your contact details to communicate with you. Your data and information will enable us to notify you about important functionality changes to the Website and will be used for statistical analysis purposes to improve the quality and the services offered to

you.

Rawlplug may use the information, except for personal data, it collects for a range of business purposes, including but not limited to:

- present the Website and its contents to you and enable you to use functions of the Website and its contents;
- prepare, conclude and perform contracts for electronically supplied services between you or organization you represent and Rawlplug;
- create and manage your account registrations;
- process, record and track your purchases, payments, returns, warranties, and rebates;
- evaluate and respond to your requests, inquiries, and applications;
- communicate with you through various channels;
- publish public product reviews as submitted by you;
- compliance with obligations as required by applicable laws, including protection against and prevention from fraud and unauthorized transactions, investigate and manage claims, risk exposure, and quality, generally improve and provide security;
- control the compliance of your actions with and enforcement of applicable legal requirements and Rawlplug's policies and terms; determine, protect and enforce any of Rawlplug's rights, including an assignment to any third party;
- carry out summaries, analysis, statistics in order to operate, evaluate, and improve business, products, and services (including developing new products and services; managing our communications; determining and managing the effectiveness of advertising and marketing; analyzing products, services, websites and applications; administering the Website and applications);
- direct marketing;
- conclude and perform contracts to provide services and deliver products;
- fulfill any other purpose for which you provide it;
- in any other way Rawlplug may describe when you provide the information; and
- for any other purpose with your consent.

All the above information may be subject to profiling, i.e. automatic analysis of your information to predict certain aspects concerning your personal preferences and behavior (for example to provide you with personalized contents of the Website or customized advertisements).

**Personal data** provided by you are collected by Rawlplug for following purposes:

Purpose	Personal data	Legal basis	Duration
present the Website and its contents to you and enable you to use functions of the Website and its contents	<ul style="list-style-type: none"><li>• Data Rawlplug receives from the computer, mobile phone or other device you use to access the Website: <b>IP address, location and time.</b></li><li>• Data Rawlplug receives when you interact with the Website: posted content, photographs.</li></ul>	Article 6 pt. 1.a GDPR - consent	For the time of using the Website and afterwards
prepare, conclude and	<ul style="list-style-type: none"><li>• Contact and</li></ul>	Article 6 pt. 1.b GDPR	For the time of the

<p>Purpose perform contracts for electronically supplied services between you or organization you represent and Rawlplug</p>	<p>Personal data identification information: <b>name, surname, address, telephone number, email address, date of birth, tax number and any identification number (such as number of ID document),</b></p> <ul style="list-style-type: none"> <li>• Payment information: <b>name and surname of a card holder, payment card number and expiration date, bank account number.</b></li> <li>• Data Rawlplug receives from the computer, mobile phone or other device you use to access the Website: <b>IP address, location and time.</b></li> <li>• Data Rawlplug receives when you interact with the Website: <b>posted content, photographs.</b></li> </ul>	<p>Legal basis – performance of a contract</p>	<p>Duration contracts and settlements after termination</p>
<p>create and manage your account registrations</p>	<ul style="list-style-type: none"> <li>• Contact and identification information: <b>name, surname, address, telephone number, email address, date of birth, tax number</b></li> </ul>	<p>Article 6 pt. 1.b GDPR– performance of a contract</p>	<p>For the time of the contracts and settlements after termination</p>

Purpose

Personal data

Legal basis

Duration

**and any identification number (such as number of ID document).**

- Payment information: **name and surname of a card holder, payment card number and expiration date, bank account number.**
- Login and access credentials: **username and password for your account on the Website, or social media identifications.**
- Data Rawlplug receives when you interact with the Website: **posted content, photographs.**

process, record and track your purchases, payments, returns, warranties, and rebates

- Login and access credentials: **username**
- Contact and identification information: **name, surname, address, telephone number, email address, date of birth, tax number and any identification number (such as number of ID document).**

Article 6 pt. 1.b GDPR -performance of a contract

For the time of the contracts and settlements after termination

Purpose	Personal data	Legal basis	Duration
evaluate and respond to your requests, inquiries, and applications	<ul style="list-style-type: none"> <li>Payment information: <b>name and surname of a card holder, payment card number and expiration date, bank account number.</b></li> <li>Contact and identification information: <b>name, surname, address, telephone number, email address.</b></li> <li>Login and access credentials: username</li> </ul>	Article 6 pt. 1.b GDPR -performance of a contract	For the time of the contracts and settlements after termination
communicate with you through various channels	<ul style="list-style-type: none"> <li>Contact and identification information: <b>name, surname, address, telephone number, email address.</b></li> <li>Login and access credentials: <b>username</b></li> </ul>	Article 6 pt. 1.b GDPR -performance of a contract	For the time of the contracts and settlements after termination
publish public product reviews as submitted by you and other customers	<ul style="list-style-type: none"> <li>Login and access credentials: <b>username</b></li> <li>Data Rawlplug receives when you interact with the Website: <b>posted content, photographs.</b></li> </ul>	Article 6 pt. 1.b GDPR -performance of a contract	For the time of the contracts and settlements after termination
carry out obligations as required by applicable laws, including protection against and prevention from fraud and unauthorized transactions,	<ul style="list-style-type: none"> <li>Data Rawlplug receives from the computer, mobile phone or other device you use to access the</li> </ul>	Article 6 pt. 1.c GDPR - legal obligation	For the time needed to carry out such obligation

Purpose	Personal data	Legal basis	Duration
<p>investigate and manage claims, risk exposure, and quality, generally improve and provide security</p>	<p>Website: <b>IP address, location and time.</b></p> <ul style="list-style-type: none"> <li>• Contact and identification information: <b>name, surname, address, telephone number, email address, date of birth, tax number and any identification number (such as number of ID document),</b></li> <li>• Payment information: <b>name and surname of a card holder, payment card number and expiration date, bank account number.</b></li> <li>• Data Rawlplug receives when you interact with the Website: <b>posted content, photographs.</b></li> </ul>		
<p>control the compliance of your actions with and enforcement of applicable legal requirements and Rawlplug's policies and terms; determine, protect and enforce any of Rawlplug's rights, including an assignment to any third party</p>	<ul style="list-style-type: none"> <li>• Data Rawlplug receives from the computer, mobile phone or other device you use to access the Website: <b>IP address, location and time.</b></li> <li>• Contact and identification information: <b>name, surname, address, telephone</b></li> </ul>	<p>Article 6 pt. 1.f GDPR – legitimate interest</p>	<p>Until the limitation period lapsed</p>

Purpose	Personal data	Legal basis	Duration
<p>carry out summaries, analysis, statistics in order to operate, evaluate, and improve business, products, and services (including developing new products and services; managing our communications; determining and managing the effectiveness of advertising and marketing; analyzing products, services, websites and applications; administering the Website and applications)</p>	<p><b>number, email address, date of birth, tax number and any identification number (such as number of ID document),</b></p> <ul style="list-style-type: none"> <li>• Payment information: <b>name and surname of a card holder, payment card number and expiration date, bank account number.</b></li> <li>• Data Rawlplug receives when you interact with the Website: <b>posted content, photographs.</b></li> <li>• Data Rawlplug Article 6 pt. 1.f GDPR receives from the computer, mobile phone or other device you use to access the Website: <b>IP address, location and time.</b></li> <li>• Contact and identification information: <b>name, surname, address, telephone number, email address, date of birth, tax number and any identification number (such as number of ID document),</b></li> </ul>	<p>– legitimate interest, and in the case of processing this data through cookies - Art. 6 sec. 1 lit. a - consent</p>	<p>For the time needed to carry out such activities</p>

Purpose	Personal data	Legal basis	Duration
direct marketing	<ul style="list-style-type: none"> <li>• Payment information: <b>name and surname of a card holder, payment card number and expiration date, bank account number.</b></li> <li>• Data Rawlplug receives when you interact with the Website: <b>posted content, photographs.</b></li> <li>• Data Rawlplug Article 6 pt. 1.f GDPR receives from the computer, mobile phone or other device you use to access the Website: <b>IP address, location and time.</b></li> <li>• Contact and identification information: <b>name, surname, address, telephone number, email address, date of birth, tax number and any identification number (such as number of ID document),</b></li> <li>• Payment information: <b>name and surname of a card holder, payment card number and expiration date, bank account</b></li> </ul>	- legitimate interest	For the time needed to carry out such activities

Purpose	Personal data	Legal basis	Duration
conclude and perform contracts to provide services and deliver products concluded via the Website	<ul style="list-style-type: none"> <li><b>number.</b></li> <li>Data Rawlplug receives when you interact with the Website: <b>posted content, photographs.</b></li> <li>Contact and identification information: <b>name, surname, address, telephone number, email address, date of birth, tax number and any identification number (such as number of ID document).</b></li> <li>Payment information: <b>name and surname of a card holder, payment card number and expiration date, bank account number.</b></li> <li>Login and access credentials: <b>username.</b></li> </ul>	Article 6 pt. 1.d GDPR - performance of a contract	For the time of the contracts and settlements after termination
Operation of Rawlplug ID	<ul style="list-style-type: none"> <li>Required: <b>Name, surname, email address, country of residence.</b></li> <li>Optional: <b>Occupation, Employer, Business Name, Telephone number.</b></li> </ul>	Article 6 pt. 1.d GDPR - performance of a contract	For the time of the contracts and settlements after termination
other purpose	<ul style="list-style-type: none"> <li>As provided</li> </ul>	Article 6 pt.1.a GDPR-consent	

The provision of the above personal data **is voluntary**, however necessary for you to be presented with and use the Website and its functionalities, including concluding any contracts through the Website.

We collect and process personal data for other purpose than above only with your expressed consent and only within the scope of such consent. You are entitled to withdraw the consent at any time, however the withdrawal of the consent will not affect the lawfulness of processing based on consent before its withdrawal.

## **8. SHARING OF THE INFORMATION RAWLPLUG RECEIVES**

Rawlplug may share your information including personal data with Rawlplug Group companies for marketing purposes if you have given an expressed consent.

Rawlplug uses third parties service providers to carry out certain activities on its behalf. Examples include, agency activities, fulfilling orders, subcontracting, carrying out surveys and installations, delivering packages, sending postal mail, operating IT systems, including e-mail, providing IT resources, analyzing data, providing marketing assistance, processing credit card payments, and providing customer service, legal services, accounting services etc. These third parties are processors of your personal data needed to perform their functions, but may not use it for other purposes. Rawlplug will ensure that any processing of personal data by processors complies with provisions of GDPR, especially that any such processor is aware of and abides by obligations set for the therein. We will also ensure that any processor treats your personal data no less protective as required by applicable data protection laws and that they adopt adequate technical and organizational security measures.

Rawlplug may share your personal data with other controllers, when we believe it necessary to comply with the law, to protect the rights or safety of the Website, other users, or third parties (e.g., for fraud protection purposes, settlements purposes). Without limitation, this may include cases in which we share your personal data with government authorities, local authorities or court authorities, persons running offices of business information and assignees. Rawlplug will carefully determine the permissibility of providing personal data in each such context, paying particular attention to the type of request, types of data affected and any impact that a disclosure of personal data would have on the user affected. Should we decide to disclose personal data in such context we will also consider ways of reducing the scope of the disclosure, for instance by redacting the information provided.

Rawlplug may disclose personal data as described in this Privacy and Security Policy to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Rawlplug's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Rawlplug about the Website users is among the assets transferred

Rawlplug may share your personal data with carefully selected third parties so they may contact you with offers and information about their goods and services or for other purposes, unless you expressed your consent.

Recipients of your personal data, including Rawlplug Group companies, may be located in any country. This may include countries where applicable data protection laws provide a lesser degree of protection than EU laws, especially countries outside the territory of European Union ("third countries"). In such case, Rawlplug may transfer your personal data to a third country only where:

- the Commission has decided that the third country, a territory or one or more specified sectors within that third country, ensures an adequate level of protection. Such a transfer shall not require any specific authorization, or
- adequate level of protection is applied for your personal data, for instance by

ensuring that the recipient abides by so-called EC Model Clauses, which are sets of contractual clauses adopted by the European Commission for the purpose of adducing adequate safeguards to personal data in connection with cross-border transfers, or

- the transfer meets other requirements set forth in GDPR.

## **9. LINKS TO THIRD PARTY WEBSITES**

Rawlplug may from time to time establish relationships with other third party companies and the Website may contain links to and from such third party websites. Rawlplug will try to provide you with links to high quality, reputable sites which it believes will be of interest and relevant to you, but please note that such third party sites are not under its control and Rawlplug does not contribute to the content of such sites.

If you follow a link to any third party website, please note that they will have their own policies. When you click through to these sites you leave the area controlled by Rawlplug. Rawlplug cannot accept responsibility for any issues arising in connection with either the third party's use of your data, the site content or the services offered to you by these sites. Rawlplug therefore encourages you to check any third party website's policies before you submit any personal data to these sites.

## **10. SECURITY**

Rawlplug maintains administrative, technical, and physical safeguards designed and intended to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure or use. Despite these safeguards, due to inherent uncertainty in the use of the Internet and information systems and the potential for unlawful attacks by third parties, Rawlplug cannot guarantee that the use of systems, websites (including the Website) or applications will be completely safe or secure.

Rawlplug retains information for as long as it is needed or useful to provide and improve Rawlplug's products and services, comply with its legal obligations, resolve disputes, and enforce its agreements.

The safety and security of your personal data also depends on you. Where Rawlplug has given you (or where you have chosen) a password for access to certain parts of the Website, you are responsible for keeping this password confidential. Rawlplug asks you not to share your password with anyone. Rawlplug also urges you to be careful about giving out information in public areas of the Website like message boards. The information and personal data you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although Rawlplug does its very best to protect your personal data, Rawlplug cannot guarantee the security of your personal data transmitted to the Website. Any transmission of personal data is at your own risk. Rawlplug is not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **11. YOUR RIGHTS**

You have following rights under GDPR in relation to your personal data:

- accessing your personal data (including receiving copies thereof) – under article 15 GDPR;
- correcting your personal data – under article 16 GDPR;
- deleting your personal data – under article 17 GDPR;
- to demand restriction of processing – under article 18 GDPR;
- to demand transmission of personal data – under article 20 GDPR.

You may enforce the above rights by contacting our representative for data protection or sending a respective email to our address: [✉ gdpr.uk@rawlplug.com](mailto:gdpr.uk@rawlplug.com)

We may require additional information enabling us to verify your identity and your right to enforce the above rights.

You can review and change your personal data by logging into the Website and visiting your account profile page.

### **Automated individual decision-making**

We will not use automated individual decision-making producing any legal effects or significantly affecting you.

### **Right to object**

Apart from rights referred to in preceding paragraphs, you have the right to object, at any time, to processing of your personal data by us (including profiling) for direct marketing purpose. After filing the objection, we will restrain from processing your data for this purpose.

You have also right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on legitimate interest or public interest (including profiling). The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

### **Complaint**

In case of Rawlplug S.A., you have the right to lodge a complaint to Prezes Urzadu Ochrony Danych Osobowych. You may find details on the website: <https://uodo.gov.pl/> With regard to Rawlplug Ltd, established in the territory of the European Union, you can lodge a complaint with the competent data protection authority due to the company's seat. You can find the contact details of the competent authorities on the website: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

– if you are of the opinion that we process your personal data illegally.

## **12. CHANGES TO OUR PRIVACY POLICY**

Rawlplug may revise, update and change this privacy policy at any time and without notice to you at Rawlplug's sole discretion. Where appropriate, Rawlplug may notify its customers and/or users of the change by email.