

## Data Protection Information for Customers, Suppliers, Service Providers and Web Visitors

### **Privacy Notice**

**01/11/21 V4**

At dormakaba we take the protection of your personal data very seriously and will always process your personal data in compliance with the legal data protection regulations.

This Privacy Notice (together with our terms and conditions and any other documents referred to in it):

- describes how your personal data is collected and used
- applies to our customers, suppliers, service providers and web browsers

We respect your right to privacy and will only process personal data about you or provided by you in accordance with the Data Protection Legislation, which for the purposes of this Privacy Policy shall mean:

- (i) the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations, and secondary legislation, as amended or updated from time to time in the UK; and then
- (ii) any successor legislation to the UK GDPR or the Data Protection Act 2018 and other applicable privacy laws.

This Privacy Notice has been drafted to be as clear and concise as possible. Please read it carefully to understand our policies regarding your information and how we will treat it.

### **Responsible Authority and Data Protection Officer**

Our organisation name is **dormakaba UK Ltd, Kaba Ltd and dormakaba Ireland Ltd** ("organisation", "we", "our", or "us") and are a "data controller". This means that we are responsible for deciding how we hold and use personal data about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

### **Our contact details**

Our registered UK address is:

dormakaba UK Ltd  
Wilbury Way  
Hitchin  
Hertfordshire  
SG4 0AB

Phone Number: 01462 477600, General E-mail: [info.gb@dormakaba.com](mailto:info.gb@dormakaba.com)

our **Data Protection Officer is Tracy Davey**, GDPR E-mail: [gdpr.GB@dormakaba.com](mailto:gdpr.GB@dormakaba.com)

Please click this link for specific contact details <https://www.dormakaba.com/gb-en/contact>

## What Personal Data do we Collect?

We currently collect and process the following information:

- Name
- Contact details
- Job Title
- Addresses
- Telephone
- Delivery address
- Customer Account Number
- Bank details
- Tax identification details (UTR Unique Rax Reference) (CIS Construction Industry Scheme)
- Access Codes
- Contracts
- Customer Guest name
- Customer Date of Birth
- Customer Staff Dates of Stay
- Customer Staff Photo
- Customer Staff Security Clearance
- Customer Staff Gender
- Customer Staff Language
- Certification & Qualifications
- Training
- Insurance & Liability
- Personal injuries
- CCTV
- Visitor to site contact details
- Vehicle Registration (site visitors)
- Call recording
- Salutation
- DBS Enhanced Checks

## Special Categories of Data

We may also collect, store, and use "special categories" of more sensitive personal data. Our lawful bases for processing this data:

- Explicit consent
- Employment, social security, and social protection law
- Legal claims and judicial acts
- Reasons of substantial public interest conditions
- Health or social care

We rely on processing conditions at Schedule 1 Part 1, Part 2, and Part 3 of the Data Protection Act 2018.

Our '*Data Protection Special Categories of Data Appropriate Document Policy*' provides further information about this processing, please contact our Data Protection Officer if you would like to see a copy of this document.

## Purpose of Processing Personal Data

We may need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal data to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal data are:

## **Marketing**

- Marketing Contact lists
- Internet Orders
- Mail shots including price increase notification & despatch
- Surveys
- Exhibitions
- Webinars
- Website Leads
- CRM Data load for importing contact lists

## **Customer Specialist Team**

- Telemarketing Campaigns
- Web Chat Log

## **Accounts**

- Account Creation
- Account Credit Checks
- Accounts Receivable – Suppliers
- Accounts Payable – Suppliers
- Manual/Card Payments
- Invoices
- Credits
- Supplier Set up
- Acquisitions
- Business Auditing

## **HSQE**

- Evidence of Competence
- H&S Contractor Vetting
- RIDDOR Notification
- Contractors on site
- Visitors on site
- Processing Civil Claims

## **Access Systems**

- Installation of software

## **Service & Service Estimating**

- Technician Management
- Customer Estimates
- Service Call Logging

## **Supply Chain**

- Vendor Appraisals
- Code of Conduct
- Courier Performance
- Freight Contracts
- Purchase Orders
- Card Bureau (Access & Time Management)
- CCTV for security
- Fleet incl. Vehicle Tracking

## **HR**

- Recruitment

## **Sales**

- Email enquiries & Correspondence
- Quotation Processing
- General Enquiries
- Customer Contracts
- Customer Key Registration
- Customer Permutations & Specifications
- Customer Proformas
- Returns
- Works Orders & Despatch notes
- Order Processing & Confirmation

## **Solutions**

- Project Registration
- Backups of customers systems for diagnostic and recovery purposes
- Sales Quotations
- Product offering & Sales Leads

## Lawful basis for processing personal data

Under UK GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis's applies:

- You have given **consent** to the processing of your personal data for one or more specific purposes
- processing is necessary for the **performance of a contract** to which you are a party or to take steps at the request of you prior to entering a contract
- processing is necessary for compliance with a **legal obligation** to which we are subject
- Where you would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing for our **legitimate interests**.

NB, where data is collected under legitimate interests, we will have conducted a Legitimate Interests Assessment (LIA) to help demonstrate compliance and to adhere to our responsibility for considering and protecting people's rights and interests.

## How the data is collected

- Individuals/customers direct input
- Customer sharing contractor details for installation
- Marketing leads
- Business owners direct
- Business contacts via LinkedIn and similar approaches
- Sales Team
- Direct contact to customer to request the data
- Emails, telephone, and web enquiries/cookies
- Tax process
- Audit testing process
- Credit assist process
- Solicitors - personal injury, liability, claims
- Training Portals
- 3<sup>rd</sup> Party, Barbour ABI, specified by BIM objects
- Service Providers

Please see our Cookies list here <https://www.dormakaba.com/gb-en/cookies>

## Information regarding the collection of personal data via our website

Collection of personal data when visiting our website

(1) When using our website for purely informational purposes, i.e., without registering or otherwise submitting information to us, we only collect the personal data that your browser transmits to our server. If you would like to view our website, we collect the following data

that we require from a technical point of view to display our website to you and guarantee stability and security (the legal basis here is article 6 (1) sentence 1, lit. f GDPR):

- IP address
- Date and time of enquiry
- Time zone difference to Greenwich Mean Time (GMT)
- Content of request (specific page)
- Access status/HTTP status code
- Volume of data transmitted
- Website from which the request originated
- Browser
- Operating system and its interface
- Language and version of browser software

(2) In addition to the aforementioned data, when using our website, cookies will be stored on your computer. Cookies are small text files stored on your hard drive by the web browser you are using, enabling certain information to be collected by the website owner who sets the cookie (in this case us). Cookies cannot execute programs or transmit viruses onto your computer. They are designed to make the internet service as a whole more user-friendly and effective.

(3) Use of cookies:

Our website uses the following types of cookies, the scope and functioning of which shall be described below:

Transient cookies (a)

Persistent cookies (b)

- a) Transient cookies are automatically deleted when you close the browser. These include session cookies in particular. They store a so-called session ID with which the various requests from your browser are assigned to the session as a whole. This means your computer can be recognised when you return to our website. The session cookies are deleted when you log out or close the browser.
- b) Persistent cookies are deleted automatically after a specified length of time, which may differ depending on the cookie. You can delete the cookies at any time in your browser's security settings.

You can configure your browser settings according to your needs and decline acceptance of third-party cookies or all cookies, for example. However, we do advise you that you may not be able to use all functions of this website if you do this.

The Flash cookies used are not collected by your browser but by your Flash Plug-in. We also use HTML5 storage objects, which are stored on your terminal. These objects store the data required independently of your browser used and have no automatic expiry date. If you do not want Flash cookies to be processed, you have to install a corresponding add-on. The use of HTML5 storage objects may impede you as they use private mode in your browser. We recommend manually deleting your cookies and browser history regularly.

This website uses Google Analytics, a web analysis service of Google Inc. ("Google").

## Google Analytics

(1) Google Analytics uses so-called “cookies”, text files that are stored on your computer and enable analyses to be carried out regarding your use of the website. The information generated by the cookie about your use of this website is generally transmitted to a server of Google in the USA and stored there. In the event that IP anonymisation is activated on this website, your IP address will be shortened in advance by Google, however, within Member States of the European Union or in other Contracting States to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a server of Google in the USA and shortened there. On behalf of the operator of this website, Google shall use this information to analyse your use of the website to compile reports on website activity and perform further services associated with website usage and internet usage for the website operator.

(2) You can prevent cookies being stored by selecting the corresponding setting in your browser software; we advise, however, that you may not be able to use the functionality of this website to its fullest extent in this case. You may also prevent the gathering of data generated by the cookie relating to your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

(3) This website uses Google Analytics with the extension “\_anonymise()”. Here, IP addresses are further processed in shortened form meaning individual identification of the user is not possible. Should the data gathered about you enable identification, this will be immediately precluded, and the personal data immediately deleted.

(4) We use Google Analytics to analyse and regularly improve use of our website. Using the statistics obtained, we can improve our offering and make it more interesting for you as a user. For exceptional cases in which personal data is transmitted to the USA, Google is subject to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The legal basis for use of Google Analytics is article 6(1) sentence 1, lit. f GDPR.

(5) Third-party provider information: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001.

User conditions: <https://marketingplatform.google.com/about/analytics/terms/us/>

Overview of data protection: <https://support.google.com/analytics/answer/6004245?hl=en>

Data privacy statement: <https://policies.google.com/privacy?hl=en&gl=en>

## **Privacy statement for dormakaba newsletter**

(1) With your consent you may subscribe to our newsletter in which we inform you about our current offers that may be of interest. The advertised goods and services are mentioned in the declaration of consent.

(2) We use the double opt-in procedure when you register for our newsletter. This means that after your registration we send you an e-mail to the e-mail address you provided in which we ask you for confirmation that you would like to receive the newsletter. If you do not confirm your registration within 24 hours, your information will be blocked and then deleted automatically after one month. We also store your IP addresses and the times of your registration and confirmation. The purpose of this procedure is to verify your registration and to discover any possible misuse of your personal data.

(3) The only mandatory information required to send the newsletter is your e-mail address. Provision of further data shown separately is voluntary and is used to address you personally. After your confirmation we store your e-mail address in order to send a newsletter. The legal basis is Art. 6 (1) s. 1 a GDPR.

(4) You may revoke your consent at any time and unsubscribe from the newsletter. You may revoke your consent by clicking on the link provided in every newsletter or by using the above contact details to send a message.

(5) We draw your attention to the fact that we evaluate your user behaviour when the newsletter is sent. For this evaluation, the e-mails sent contain so-called web beacons or tracking pixels which represent single-pixel image files stored on our website. For these evaluations we link the data mentioned in (3) and the web beacons to your e-mail address and an individual ID.

Links in the newsletter also contain this ID. We use the data obtained in this way to create a user profile to tailor the newsletter to your individual interests. In this process we make a record of when you read our newsletters, which links in them you click on, and then draw conclusions about your personal interests. We link this data with your actions on our website.

You may object to tracking at any time by clicking on the separate link provided in every e-mail or by informing us via any other communication channel. The information will be stored as long as you subscribe to the newsletter. After you unsubscribe, we will only store the data in a statistical and anonymous form.

Furthermore, such tracking is not possible if you have disabled the display of images in the default settings in your e-mail application. In this case the newsletter will not be fully displayed, and you may not be able to use all the functions. If you choose to display the images manually, the above-mentioned tracking will take place.

## **Data Processors**

Service providers used by us may also receive your data.

These are initially other dormakaba companies, as well as companies including postal and printing services, IT service providers, telecommunications service providers (call centres), sales partners, web service providers, credit agencies, collection agencies and other service providers hired for the fulfillment of orders.

Under certain conditions, personal data may also be transferred to public institutions, e.g., tax authorities, judicial and law enforcement authorities (e.g., police, prosecution offices, courts), lawyers and notaries, as well as accountants. Specifically, the following recipients may receive your personal data:

- Marketing
- Supply Chain
- Accounts
- HR
- Sales
- Service

## **Data Retention**

We will keep personal data for as long as is necessary. Please contact our Data Protection Officer if you require further details on our retention periods, [gdpr.GB@dormakaba.com](mailto:gdpr.GB@dormakaba.com)

We review our data retention obligations to ensure we are not retaining data for longer than we are legally obliged to.

## **Data security**

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected, including:

- Restricted user access
- Password protection
- IT System Security
- Lock & key access

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Sharing Personal Information & Transfer out of UK to EEA / Third Counties**

We may transfer your collected data to storage outside the UK. It may be processed outside the UK to fulfil your order and to receive our Services and deal with payment.

If we do store or transfer data outside the UK, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the UK GDPR. Such steps may include, but not be limited to, determining adequacy decisions in place, implementing International Data Transfer Assessments, conducting Transfer Risk Assessments and the use of legally binding contractual terms between us and any third parties we engage with

If you would like further details on 3<sup>rd</sup> parties and data processors we use, please contact us and we will be happy to provide further information to you.



## Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Rights with respect to automated decision-making and profiling**, as set out in section "Automated Decision-Making and Profiling".

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

### To enforce any of these rights please contact us at

dormakaba UK Ltd  
Wilbury Way  
Hitchin  
Hertfordshire  
SG4 0AB

<https://www.dormakaba.com/gb-en/contact>

Data Protection Officer  
[gdpr.GB@dormakaba.com](mailto:gdpr.GB@dormakaba.com)

You can contact the data protection officer (contact details above) and request a DSAR form for completion and return to the data protection officer.

## Complaints

We will use our best efforts to negotiate in good faith and settle any dispute that may arise out of or relate to this Privacy Notice or any breach of it.

If you have any questions about this privacy notice or how we handle your personal data, please contact the Data Protection Officer at [gdpr.GB@dormakaba.com](mailto:gdpr.GB@dormakaba.com)

You also have the right to complain to the Information Commissioner's Office <https://ico.org.uk/make-a-complaint/>

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

### **Other information**

**CCTV** - we have several CCTV around the warehouse and building of the following sites:

- Bolton
- Willenhall
- Lichfield
- Hitchin
- Tiverton
- Falkirk
- Washington
- Ireland

If you would like a copy of our CCTV policy **dormakaba UK & Ireland CCTV Policy** for more information, please contact us or visit our GDPR web page <https://www.dormakaba.com/gb-en/about-us/gdpr>

### **Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information.

Last review date: 13/07/23

Next review date: 13/07/24