

# STL INTERNATIONAL LTD PRIVACY POLICY



## WHO WE ARE

We are STL International Ltd, a company registered in England and Wales with company number 04523345 and our registered office at Unit 3, Hill Farm, Linton Hill, Maidstone, Kent ME17 4AL (STL, we, us or our).

## PURPOSE OF THIS PRIVACY POLICY

STL are committed to protecting your privacy in accordance with the UK General Data Protection Regulation (UK GDPR). This policy applies when we are in control of any personal data and acting as “Data Controller”, that is where we have determined the purposes and means of the processing of that personal data. It applies where we are processing personal data relating to our existing customers as well as new prospective customers and users of our website, [www.stl-int.co.uk](http://www.stl-int.co.uk) (Website).

## AMENDMENTS TO THIS POLICY

If any amendments are made to this notice, we will notify you by updating the privacy policy on our Website and in our news section.

## HOW TO CONTACT US

We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise any of your rights as a data subject, please contact our data protection manager using the details set out below. Mail: STL International Ltd, Unit 3, Hill Farm, Linton Hill, Maidstone, Kent ME17 4AL. Telephone: 01622 749633 Email: [privacy@stl-int.co.uk](mailto:privacy@stl-int.co.uk)

## THIRD PARTY LINKS

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

STL Reference:	Date:		Revision:
PP_2021.07.01	July 2021		1
STL International Ltd Company Policy			pg. 1 of 5

# THE PERSONAL DATA WE COLLECT ABOUT YOU AND WHEN

We may collect certain technical data about you when you access and use the Website, including your internet protocol (IP) address, time zone setting and location and other technology on the devices you use to access the Website (Technical Data). We may also collect information about you using cookies and similar technologies, please see our Cookies Policy for further information.

We may collect information about how you use the Website (Usage Data).

We may collect your name, email address and employer/business name where you subscribe to receive our news and offers by email on our Website. Where you have subscribed to receive our news and offers, we may collect details of your interaction with our communications (e.g. whether these are opened, whether you 'click-through' to access our offers etc.).

We may also collect personal data about you when you interact with us via our social media channels (for example, Twitter, Facebook and YouTube). The personal data we may collect includes your name, email address, social media handle and any other personal data you may provide to us. We will only process any personal data collected in this way to deal with your specific query/comment.

We may also collect, use and share Aggregated Data such as statistical data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate Technical Data to calculate the percentage of users accessing the Website using a certain browser and to assist us in identifying any improvement areas. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

STL Reference:	Date:		Revision:
PP_2021.07.01	July 2021		1
STL International Ltd Company Policy			pg. 2 of 5

# HOW WE USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of personal information	Lawful basis for processing
To administer and protect the Website	Technical Data	Necessary for our legitimate interests (for running our business, provision of administration and IT services, networks security and to prevent fraud) and to comply with a legal obligation.
To deliver relevant website content and functions to you and to use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Usage Data and Technical Data	Necessary for our legitimate interests (for understanding how our website is used and the profile and interests of our customers so we can improve the Website and our business).
To send our marketing communications to you	Name, email address, business/employer name and Technical Data	Your consent (sending the marketing communications) and necessary for our legitimate interests (monitoring the effectiveness of our communications assists us in tailoring our communications so they are more relevant to our customers and assists us in making our communications more effective).
To interact with our customers/potential customers via social media	Name, email address, social media handle and any other personal data you choose to provide	Necessary for our legitimate interests (for being able to provide customer services through our social media accounts, build our brand through interacting with customers/potential customers and increase business)

Where you have subscribed to receive our news and offers, you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time (using the details above).

STL Reference:	Date:		Revision:
PP_2021.07.01	July 2021		1
STL International Ltd Company Policy			pg. 3 of 5

# DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with our carefully selected third party service providers to assist us in providing our services to you, this includes:

- Our website hosts, IONOS
- Our analytics providers
- Our marketing agent
- Our software providers
- Mailchimp (The Rocket Science Group LLC) who manages our marketing database on our behalf.

We may also need to share your personal information with our professional advisors (including lawyers, bankers, auditors and insurers), regulators and similar authorities (such as HMRC) and any third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business then the new owners may use your personal information in the same way as set out in this policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## INTERNATIONAL TRANSFERS

Mailchimp (our marketing database provider) is located in the United States so, where you subscribe to receive our news and offers, your information may be transferred to, stored and processing in the United States. Mailchimp participates in and has certified its compliance with the UK-US Privacy Shield Framework and has entered into a data processing agreement with us to ensure the security of your personal data.

IONOS (our website provider) is based in the EU.

## DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

## DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

STL Reference:	Date:		Revision:
PP_2021.07.01	July 2021		1
STL International Ltd Company Policy			pg. 4 of 5

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements

## CHILDREN'S PRIVACY

The Website is not intended for children and we do not knowingly collect data relating to children.

## YOUR LEGAL RIGHTS

When providing us with your personal data, it is important to us that you are aware of the following rights that you have in relation to our processing of that said personal data.

- You are entitled to be provided with a copy of any personal data concerning yourself that we process, unless that affects the data protection rights of others. You can also be provided with information on how that personal data is processed by Ansell Lighting.
- You can object at any time to the way in which we process your data where we are relying on a legitimate interest and there are grounds that are relative to your particular situation which makes this objectionable for you.
- You can object at any time to us processing your personal data for direct marketing purposes and request to be removed from any future direct communication/marketing.
- You can request that we update any incomplete or inaccurate personal data that we are holding about you.
- You can request, in certain circumstances, that we delete or remove any personal data we are holding about you.
- You can request that we suspend processing of your personal data where the personal data is inaccurate, where our processing is unlawful, where you require us to hold the data for the purpose of your establishment, exercise or defence of legal claims and/or where we are relying on our legitimate interests for the processing but you have objected to such processing.
- You can, in certain circumstances, request the transfer of your personal data to you or a third party.
- Where we are relying on consent for our processing of your personal data, you can withdraw your consent to our processing at any time.
- You can exercise any of the rights stated above by contacting us using the details stated below. Our registered office is: STL International Ltd, Unit 3, Hill Farm, Linton Hill, Maidstone, Kent ME17 4AL.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Policy last updated July 2021

STL Reference:	Date:		Revision:
PP_2021.07.01	July 2021		1
STL International Ltd Company Policy			pg. 5 of 5