

## Maxell Europe Limited

### Privacy Policy

#### 1. INTRODUCTION

Maxell Europe Limited (**Company**) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you communicate with us i.e. email, telephone, post, social media or visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice aims to give you information on how the Company collects and processes your personal data through your communication with us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and is not intended to override them.

The sites under the domain names and associated sub-domains of Maxell Europe Limited operated by the Company.

#### 2. CONTROLLER

Maxell Europe Limited is the controller and responsible for your personal data (collectively referred to as the **Company**, "**we**", "**us**" or "**our**" in this privacy notice).

This privacy notice is issued on behalf of the Maxell Europe Limited so when we mention "**Company**", "**we**", "**us**" or "**our**" in this privacy notice, we are referring to the relevant company in the Maxell Group responsible for processing your data. The Company is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact please contact us in writing, by email or telephone using the details shown in paragraph 16 below.

#### 3. THIRD-PARTY LINKS

Our 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. Our website is not intended for children and we do not knowingly collect data relating to children. 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 notice of every website you visit.

#### 4. **ABOUT THE INFORMATION WE COLLECT AND HOLD**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in the table set out in the Schedule.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

#### 5. **HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

5.1 **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email, EDI, FTP, online or otherwise.

5.2 **Automated technologies or interactions.** As you interact with our website or social media platform we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our cookie information in clause.9.

5.3 **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below;

5.3.1 Technical data from the following parties:

- (a) analytics providers such as Google;
- (b) advertising networks; and
- (c) search information providers.

5.3.2 Contact, financial and transaction data from providers of technical, payment and delivery services.

5.3.3 Identity and contact data from data brokers or aggregators.

- 5.3.4 Identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## **6. HOW WE USE YOUR PERSONAL DATA**

The main purposes/activities for which we process your personal data are summarised in the table in the Schedule and include the following:

- 6.1 To register you as a new customer.
- 6.2 To provide you with our products and services.
- 6.3 To manage payments, fees and charges and collect and recover money owed to us.
- 6.4 To communicate with you and manage our relationship, which will include:
  - 6.4.1 Providing you with updates you have requested;
  - 6.4.2 Notifying you about changes to our terms or privacy policy;
  - 6.4.3 Asking you to leave a review;
- 6.5 To enable you to partake in a prize draw, competition or complete feedback or a survey etc.
- 6.6 To administer and protect our business, social media platforms and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- 6.7 To deliver relevant social media and website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.
- 6.8 To use data analytics to improve our social media, website, products or services, marketing, customer relationships and experiences.
- 6.9 To make suggestions and recommendations to you about products or services that may be of interest to you.
- 6.10 We may need to share some of the categories of personal information with other parties as set out in the Schedule. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us in writing, by email or telephone using the details shown in paragraph 16 below.

## **7. MARKETING & PROMOTIONAL OFFERS**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

## **8. OPTING OUT**

We will get your express opt-in consent before we share your personal data with any third party or company outside the Maxell group of companies for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by writing to the registered address of that company at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase, warranty registration, product or service experience or other transactions.

## 9. **COOKIES**

A cookie is a small piece of data that is stored on your computer or mobile device. Like many websites, we use cookies and similar technologies to collect additional website usage data and to operate our services. Cookies are not required for many parts of our services such as searching and looking at public profiles. Although most web browsers automatically accept cookies, many browsers' settings can be set to decline cookies or alert you when a website is attempting to place a cookie on your computer.

However, some of our services may not function properly if you disable cookies. When your browser or device allows it, we use both session cookies and persistent cookies to better understand how you interact with our services, to monitor aggregate usage patterns, and to personalize and otherwise operate our services such as by providing account security, personalizing the content we show you including ads, and remembering your language preferences.

More information about cookies is available at;

<http://www.aboutcookies.org.uk/>

[http://ec.europa.eu/ipg/basics/legal/cookies/index\\_en.htm](http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm)

## 10. **DISCLOSURES OF YOUR PERSONAL DATA**

As outlined in the table in the Schedule, we may need to share your personal data with third parties, examples of which are listed below:

- 10.1 Internal third parties, being other group companies acting as joint controllers or processors.
- 10.2 External third parties as follows:
  - 10.2.1 Service providers who provide IT, System administration, Technical or warranty services.
  - 10.2.2 Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
  - 10.2.3 HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

- 10.2.4 Trademark, Patent, Domain or Market research companies, fraud detection or credit reference agencies, government or non-government agencies or those authorities with a legal right of enforcement.
  - 10.2.5 Business to business, business to retail, e-commerce, distributors, suppliers or any other company we procure, supply or enter into a business relationship with to provide a service to you or to resolve an issue, complaint, faulty good(s), delay or incorrect delivery or any other legitimate reason.
- 10.3 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 data in the same way as set out in this privacy 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.

## 11. **INTERNATIONAL TRANSFERS OF INFORMATION**

We may share your personal data within the Maxell Group of companies. This will involve transferring your data outside the European Economic Area (**EEA**).

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "**binding corporate rules**".

Whenever we transfer your personal data out of the EEA, we will ensure that any such transfer is made securely and that there is adequate protection in place in order to protect your personal data, as required by the Data Protection Act 2018 and the provisions of Regulation (EU) 2016/679, including requiring the transferee to enter into model contractual clauses or (if US based) being a member of the Privacy Shield.

If we transfer your personal data outside the EEA you can ask us for a copy of relevant safeguards.

## 12. **HOW LONG WE KEEP YOUR INFORMATION**

We keep your information during and after your custom with us for no longer than is necessary for the purposes for which the personal information is processed, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements. Further details are available in our Data Retention Policy which you can request from us by contacting us using the details in clause 16.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### 13. YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED

#### Your rights in connection with personal information

13.1 Under certain circumstances, by law you have the right to:

**Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal information to another party.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact in writing, by email or telephone using the details shown in paragraph 16 below.

### **No fee usually required**

13.2 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

13.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure we take to ensure that personal information is not disclosed to any person who has no right to receive it.

## **14. KEEPING YOUR PERSONAL INFORMATION SECURE**

The information you supply to us will be held on our servers located in datacentres hosted by one or more approved providers.

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.



**15. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**16. CONTACTS & COMPLAINTS**

If you have any questions about how we treat and protect your personal data and your privacy, if you have any comments, wish to seek to exercise any of your rights as outlined above or to complain, please write to the Data Protection officer (DPO) at; Maxell Europe Limited, C/o DPO, Whitebrook Park, Lower Cookham Road, Maidenhead SL6 8YA, UK or email; [dpo@maxell.eu](mailto:dpo@maxell.eu) or by telephone on 01628 412059.

We hope that we can resolve any query or concern you raise about our use of your information. If not, you may contact the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Effective date: 25 May 2018



Mazasumi Ishiwata

Maxell Europe Limited - Managing Director

## Schedule

### About the information we collect and hold

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Identity data including first name, maiden name, last name or similar identifier, marital status, title, date of birth, gender and employment information.</p>	<p>From you</p>	<p>To enter into/perform our service or contract with you</p> <p>Legitimate interest: to ensure that you are properly identified as a customer and that we are able to perform our obligations under our contract with you on an on-going basis</p> <p>Where we need to comply with a legal or regulatory obligation</p>	<p>To enter into/perform our service or contract with you</p>
<p>Contact data, including addresses, email addresses and telephone numbers.</p>	<p>From you</p> <p>From selected third parties such as data brokers or aggregators</p> <p>From publicly available sources such as Companies House and the Electoral Register</p>	<p>To enter into/perform our service or contract with you</p> <p>Legitimate interest: to ensure that you are properly identified as a customer and that we are able to perform our obligations under our contract with you on an on-going basis.</p> <p>To provide our clients a high standard of customer service which may necessitate investigation with group or third party companies on relevant technical, service or products issue(s).</p>	<p>To enter into/perform our service or contract with you.</p> <p>We may share this information with group or third party companies to enable us to provide a service to you or to resolve an issue, complaint, faulty good(s), delay or incorrect delivery or any other legitimate reason.</p>
<p>Financial data including bank account details, billing information, payment card details and credit history, information to enable us to undertake credit or other financial checks on you</p>	<p>From you</p> <p>From selected third parties including credit reference agencies</p>	<p>To enter into/perform our service or contract with you</p> <p>Legitimate interest: to establish your ability to make payments to us under our contract with you, and to obtain such payments</p>	<p>To enter into/perform our service or contract with you</p> <p>To establish your ability to make payments to us and to obtain such payments</p>

<p>Contract and transaction data including details about payments to and from you and other details of products and services you have purchased from us, contact history, purchase history, saved items</p>	<p>From you</p> <p>Automatically from our information technology systems and our customer relationship management software</p> <p>From providers of technical payment and delivery services</p>	<p>To enter into/perform our service or contract with you</p> <p>Legitimate interest: to keep our records up to date</p> <p>Legitimate interest: to monitor how customers use our products and services for the purposes of business management and planning and to identify whether any other products or services may be of interest to you</p>	<p>To enter into/perform our service or contract with you</p> <p>To keep our records up to date</p> <p>For business management and planning</p> <p>To identify future customer demand</p>
<p>Information involving feedback, questions and complaints received by us from you in relation to our products and services and your responses to surveys, competitions and promotions</p>	<p>From you</p>	<p>To enter into/perform our service or contract with you</p> <p>Legitimate interest: to maintain accurate records and to comply with legal, regulatory and corporate governance obligations and good practice</p>	<p>To perform our service or contract with you</p> <p>To maintain accurate records and to comply with legal, regulatory and corporate governance obligations and good practice</p>
<p>Technical data, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our social media or websites</p>	<p>Automatically as you interact with our websites by using cookies, server logs and other similar technologies. We may also receive this data about you if you visit other websites employing our cookies. Please see our Cookie Policies on our websites for further details</p>	<p>Legitimate interest: to ensure that our websites are user friendly and work for you and other customers</p> <p>Legitimate interest: to define types of customers for our products and services, to keep our social media / website updated and relevant, to develop our business and to inform our marketing strategy</p>	<p>To ensure that our websites are user friendly and work for you and other customers</p> <p>To define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy</p> <p>We may share this information with selected third parties including our information technology and marketing advisers</p>
<p>Profile data, including your username and password, location, purchases or orders made by you, your interests, preferences, feedback and survey responses, personal or professional interests, information from accounts you link to us e.g. Facebook, LinkedIn, Twitter etc.</p>	<p>From you</p> <p>Automatically as you interact with our social media / websites by using cookies, server logs and other similar technologies. We may also receive this data about you if you visit other social media / websites employing our cookies</p>	<p>Legitimate interest: to define types of customers for our products and services, to keep our social media/ website updated and relevant, to develop our business and to inform our marketing strategy</p>	<p>To define types of customers for our products and services, to keep our social media/ website/records updated and relevant, to develop our business and to inform our marketing strategy</p> <p>To study how customers use our products/services</p> <p>We may share this information with selected third parties, including our</p>

			information technology and marketing advisers
Usage data, including information about how you use our social media, websites, products and services	From you Automatically as you interact with our websites by using cookies, server logs and other similar technologies. We may also receive this data about you if you visit other social media / websites employing our cookies	Legitimate interest: to ensure that our websites are user friendly and work for you and other customers  Legitimate interest: to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy	To ensure that our websites are user friendly and work for you and other customers  To define types of customers for our products and services, to keep our website/records updated and relevant, to develop our business and to inform our marketing strategy  We may share this information with selected third parties, including our marketing advisers
Marketing and communications data, including your preferences in receiving marketing from us and our third parties and your communication preferences	From you	Legitimate interest: to keep our records up to date and to understand how you wish for us to communicate with you	To enter into/perform our contract with you  To keep our records up to date and to understand how you wish for us to communicate with you