



Privacy Statement (GDPR)

Tufftruk Limited, whose registered office is: The Croft, Sheen nr Buxton, Derbyshire SK17 0EU, GB ("us" "we" "our") is committed to protecting and preserving your privacy, including the privacy of all visitors to www.truxta.com (the "Website").

Please read this privacy policy to understand how we use and protect the information that you provide to us.

Our personal information handling policy and procedures have been developed in line with the requirements of the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

This privacy policy (together with our website terms of use, terms and conditions of sale, and our cookie policy and any other documents referred to in them) sets out the basis on which we collect information from you and how we use information which we collect or which you provide to us. This includes information which we collect or that you provide manually or via our website www.truxta.com or other online services and platforms (together, our "Site").

INFORMATION THAT WE COLLECT FROM YOU

We collect and process personal data about you when you interact with us in any way. This could be when you purchase goods from us, sell your products to us or if you apply for a job with us, or submit a general enquiry. This may be by filling in a form on our website such as our "Contact Us" form, or our Job application form, or it could be by sending us e-mails or texts, by adding posts or comments to our site, by interacting with us on social media platforms, by writing to us or as a result of contacting us by telephone.

The personal data we process includes:

- Your name and title
- Your username and password
- Your home or work address, e-mail address and/or phone number
- Information related to the browser or device you use to access our website, relevant IP address and geographic location.
- Internet browser and browsing history.
- Social media content where you have sent us messages via a social media platform.
- CCTV images if you visit our business premises. We use this information for the purposes of security and the prevention of fraud and other criminal activity.
- It could include recordings of calls you make to us or we make to you. You will be informed at the beginning of the call if it is to be recorded.
- Where you trade with us, it will include trading history, payment and delivery details, including billing and delivery addresses and details of any relevant payment cards or bank account details.
- If you apply for a trade credit account with us, it will include information from 3rd parties such as from your bank, from trade references or credit reference agencies in order for us to establish suitable credit limits and to ensure we will be paid for products sold to you.
- If you apply for a job with us or register your interest in a job with us we will additionally collect information relating to your qualifications, experience, employment history, references, national insurance number, salary and benefits expectations, career expectations, previous convictions and information about your entitlement to work in the UK.
- Information collected independently by online advertising networks (for example Google) through which we may place advertisements. The information we obtain varies from

network to network. It often summarises the actions of lots of people, in which case it does not enable us to identify you individually. It relates to what you view, click on, and access through websites in their network, including the subject matter of the website you started at and where you subsequently go. It may also include their analysis of your behaviour across the wider internet and a profile of you. If you are unhappy about this happening you should look out for "settings" and "Do Not Track" options in online advertisements and in the privacy and cookies functionality on your devices and consider changing your settings to block third party cookies in particular. We do not control the information about you that such networks obtain, or the technology they use to do so.

- Any other information you choose to provide to us.

WHAT WE USE YOUR INFORMATION FOR AND THE LEGAL BASIS ON WHICH WE USE YOUR INFORMATION

We process the personal data listed above for the following purposes:

- As required to establish and fulfil a contract with you: if you make a purchase from us or enter into an agreement to provide goods or services to us. This may include verifying your identity, taking payments, communicating with you, checking your creditworthiness (for trade credit customers), providing customer services and arranging the delivery or other provision of products or services.
- As required to establish and fulfil a contract with you and to comply with applicable law and regulation: If you apply for a job with us we will use your data to make recruitment decisions, including confirming your identity and employment status.
- To comply with applicable law and regulation.
- In accordance with our legitimate interests to protect our legitimate business interests and legal rights. Examples include but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation), maintaining the security of our premises.
- In accordance with our legitimate interests: to investigate any complaints received from you or from others, about our website or our products or services
- In accordance with our legitimate interests: we may use information you provide to personalise (i) our communications to you; (ii) our website; and (iii) products or services for you, and to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline
- As required to establish and fulfil a contract with you and in accordance with our legitimate interests : if you provide a credit or debit card, we may also use third parties (such as POS payment providers) to check the validity of the sort code, account number and card number you submit in order to prevent fraud
- In accordance with applicable law and our legitimate interests we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime
- In accordance with our legitimate interests: we will use and analyse the information we collect so that we can administer, support, improve and develop our business.
- In accordance with our legitimate interests: in circumstances where you contact us by telephone, calls may be recorded for quality, training and security purposes.
- With your consent: we may use your information to invite you to take part in market research or surveys. In particular, we may use your information to contact you for your views on our services and to notify you occasionally about important changes or developments to the Website or our services.
- We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your consent to

receive it. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

- If you have provided this data, we may contact you by post, telephone or fax, as well as by e-mail. If you change your mind about being contacted in the future, please let us know.

In accordance with data protection law, the legal bases on which we use your information as described in this policy are:

- You have given your consent to us using your information as described in this notice.
- The use is necessary to perform a contract between us or to take steps which you requested us to take before entering into a contract.
- The use is necessary to comply with a legal obligation to which we are subject.
- The use is necessary to protect your vital interests or that of another natural person.
- The use is necessary for the performance of a task carried out in the public interest or in the exercise of our official authority.
- The use is necessary for the purposes of our legitimate interests, including direct marketing, fraud prevention or preventing crime and protecting public security.

SENSITIVE PERSONAL INFORMATION

For some purposes we may on occasion collect sensitive personal information about you. This is most likely to be the case if you apply for a job with the company and are successful. During the job application process you will be given further information on the data we collect, the legal basis on which it is collected and on what we use it for.

Very occasionally we may need sensitive personal data for other purposes, for example, information about your racial or ethnic origin may be included within the identification information you provide when collecting goods from our premises. In this case we will use this sensitive personal information for the purposes of identifying individuals to combat fraud and other criminal activity. If necessary, we will share this sensitive personal information with the police and our insurers and other organisations that provide similar products and services to ours for the purpose of fraud and crime prevention.

SHARING YOUR INFORMATION

We share your information so that we can run our business and provide you with the goods and services you expect. We only share your information where we can do so in accordance with our legal data protection and privacy obligations. We share the information we collect with:

- Transport companies so that we can deliver the goods you have ordered to you.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Our professional advisers for example our lawyers, accountants and technology consultants when they need it to provide advice to us and where it is required in order to meet our legal obligations.
- Our insurers and insurance brokers where required in order for us to be able to obtain insurance against risks we face in running our business. They may retain this information for the purpose of ongoing risk assessment and insurance broking and underwriting services.
- Credit reference agencies who provide anti-fraud and credit score information to us, central and local government departments and local authorities, banks and finance companies who also provide anti-fraud services and customer insight companies in each case as necessary in order to benefit from their services. Where we do so for anti-fraud purposes, the recipient organisation may hold your information on file for the purpose of their fraud prevention services in future. We may also share your information, including

late payment information, with credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors.

- The police, local authorities, HM Revenue & Customs (HMRC), the courts and any other central or local government bodies where they request it and/or where we may lawfully disclose it, for example for compliance with VAT regulations, to comply with a court order or for the prevention and detection of crime.
- Other people and businesses that help us provide our Site and related services to you, for example, information technology companies who host and/or maintain our Site and payment services companies who enable you to use payment cards with us.
- Analytics and search engine providers who assist us in the improvement and optimisation of our Site.
- The prospective buyer of any part of our business or assets that we may sell.
- Other people who make a subject access request to us, where we are allowed to do so by law (see Managing Your Information below for what we mean by a subject access request).

TRANSFER OF YOUR INFORMATION INTERNATIONALLY

Although we are based in the UK, we will sometimes need to use international suppliers or transfer information to our international business in order to complete our activities with you. To allow us to run our business on this basis, the information we collect may be transferred to other countries where this is necessary for the purposes of our contract with you or in anticipation of a contract (for example, in relation to obtaining a quotation). Where this includes transfers to countries outside of the EEA, we will ensure that we have appropriate contractual arrangements in place to protect your data.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are required to retain certain information by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions. If you have expressly consented to us contacting you, we will only retain your data until you unsubscribe from our communications.

YOUR RIGHTS IN CONNECTION WITH YOUR PERSONAL INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. If you have an online account with us which you manage directly, please ensure that the information (for example, contact information) you provide to us through that account remains accurate and up to date.

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 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 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 a transfer of your personal information to another party.
- Right to withdraw consent. Where you have given your consent to us using your information (e.g. for marketing purposes), you have the right to alter your preferences or withdraw this consent at any time by contacting us using the contact details set out below or, where applicable, through managing your preferences through your online account with us or clicking the 'unsubscribe' link. This will not affect the lawfulness of any use of your information that we make before you amend your preferences or withdraw your consent.

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 any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious or harmful to the rights of others.

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 to ensure that personal information is not disclosed to any person who has no right to receive it.

CHANGES TO OUR PRIVACY POLICY

Any changes to our privacy policy in the future will be posted to the Website and, where appropriate, through e-mail notification.

CONTACT

All comments, queries or requests to exercise any of your rights in relation to our use of your information, as outlined above, should be addressed to:

The Information Administrator,

Tufftruk Ltd
The Croft
Sheen nr Buxton,
Derbyshire SK17 0EU.
Great Britain
Email accounts@tufftruk.co.uk

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/> or telephone: 0303 123 1113