

Industrial Tooling Corporation Ltd - Privacy Policy

Industrial Tooling Corporation Ltd ("ITC Ltd," "we," "our," or "us") is committed to protecting your privacy. This Privacy Policy explains how your personal information is collected, used, stored, processed, transferred and disclosed by ITC Ltd.

ITC Ltd is the data controller responsible for protecting your personal information.

Our Privacy Policy applies to our websites and brands, namely www.itc-ltd.co.uk and any other website or other online service that links to this Privacy Policy (collectively, our "Service").

Before accessing or using our Service, please ensure that you have read and understood our collection, storage, use and disclosure of your personal information as described in this Privacy Policy.

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1. What information do we collect about you and how do we use it?

We collect personal information about you when you voluntarily submit information to us when you use our Service. This can include information you provide to us when you register for an account, make a purchase, post a review, send us messages, subscribe to our mailing lists, newsletters or other forms of marketing communications, participate in a survey, click on an ad, redeem a promotion or use some other feature of our Service.

We collect certain information automatically when you use the Service, such as information about the pages you look at on our Service, the actions you take on our Service or the device you use to access our Service.

We may also collect information about you from third parties. The categories of personal information we collect may include:

- Contact and profile information
- Comments, chat and opinions
- Payment and transaction information
- Location information
- Information provided by social networks
- Information provided by third parties
- Information about fraudulent or criminal activity related to your account

The table at Annex 1 sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information, the categories of recipients of the personal information, and information as to how we determine applicable retention periods. We may also share information with others in an aggregated or otherwise anonymised form that does not reasonably identify you directly as an individual.

For further information on your rights and choices regarding your information, see the Your Choices and Control Over Your Information and Your Rights In Respect Of Your Personal Information sections below.

If you choose not to provide personal information, we may not be able to provide you with requested products, services or information.

We may link or combine your activities and information collected from you on our websites and mobile apps with your purchases, as well as information we collect automatically through tracking technologies. This allows us to provide you with a personalised experience regardless of how you interact with us – online, in-person, on mobile, by telephone, or social media.

2. INFORMATION AUTOMATICALLY COLLECTED

When you use our Service, use our website, read our emails, or otherwise engage with us through a computer or mobile device, we and our third party partners, automatically collect information about how you access and use the Service, and information about the device you use to access the Service.

We use this information to enhance and personalize your user experience, to monitor and improve our websites and services, and for other internal purposes.

We typically collect this information through a variety of tracking technologies, including cookies, Flash objects, web beacons, embedded scripts, location-identifying technologies, and similar technology (collectively, “**tracking technologies**”).

Information we collect automatically about you may be combined with other personal information we collect directly.

The table at Annex 2 sets out the categories of personal information we and our third parties collect about you automatically and how we use that information. The table also lists the legal basis which we rely on to process the personal information, the categories of recipients of the personal information and information as to how we determine applicable retention periods. We may also share information with others in an aggregated or otherwise anonymised form that does not reasonably identify you directly as an individual.

For further information on third parties using technologies please see Annex 3.

For further information on your choices regarding your information, including choices around tracking technologies, see Your Choices and Control Over Your Information below.

3. THIRD PARTY DATA COLLECTION AND INTEREST BASED ADVERTISING Interest Based Advertising

We participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements based on your browsing history. We permit third party online advertising networks, social media companies and other third party services to collect information about your use of our websites and mobile apps over time so that they may play or display ads on our Service, on other websites, apps or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through cookies or similar tracking technologies, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the site and other information. We may share a common account identifier (such as an email address or user ID) with our third party advertising partners to help identify you across devices. We and our third party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research. See Your Choices and Control Over Your Information, below, to learn more about how you may control interest-based advertising.

Social Media Widgets and Advertising

Our Service may include social media features, such as the Facebook Like button, Google Plus, LinkedIn, Snapchat, Instagram, Twitter or other widgets. These social media companies may recognize you and collect information about your visit to our Service, and they may set a cookie or employ other tracking technologies. Your interactions with those features are governed by the privacy policies of those companies.

We display targeted advertising to you through social media platforms, such as Facebook, Twitter, Google+ and others. These companies have interest-based advertising programs that allow us to direct advertisements to users who have shown interest in our Service while those users are on the social media platform, or to groups of other users who share similar traits, such as likely commercial interests and demographics. These advertisements are governed by the privacy policies of those social media companies that provide them.

User Experience Information

On some of our websites or services, we use third party tools to monitor user experience information. These tools automatically collect usage information, including mouse clicks and movements, page scrolling and any text keyed into website forms. The information collected does not include passwords, payment details, or other sensitive personal data. We use this information for site analytics, optimization and to improve website usability. We do not permit this information to be shared with or used by third parties for their own purposes.

We may also share information with others in an aggregated or otherwise anonymised form that does not reasonably identify you directly as an individual.

Please see Annex 3 which sets out the third party service providers we work with to provide cross-device linking and advertising services and site analytics.

4. YOUR CHOICES AND CONTROL OVER YOUR INFORMATION

How to control your email preferences: You can stop receiving promotional email communications from us by clicking on the “unsubscribe” link provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service, technical and security notices).

Modifying or deleting your information: If you have any questions about reviewing, modifying, or deleting your information, or if you want to remove your name or comments from our website or publicly displayed content, you can contact us directly info@itc-ltd.co.uk. We may not be able to modify or delete your information in all circumstances.

Geolocation and in-branch location: You may control location tracking by adjusting your location services settings on your mobile device. We may continue to approximate your location based on your IP address when you access the Service through a computer or device.

Cookies, tracking and interest-based advertising preferences:

- **Cookies and Flash cookies.** Most browsers allow you to adjust your browser settings to: (i) notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies.

Blocking or deleting cookies may negatively impact your experience using the Service, as some features and services on our Service may not work properly.

You may set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you viewed or engaged with our emails.

Deleting cookies does not delete Local Storage Objects (LSOs) such as Flash objects and HTML5. To manage Flash cookie settings and preferences, you must use the settings manager on Adobe's website https://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

If you choose to delete Flash objects from our Service, then you may not be able to access and use all or part of the Service or benefit from the information and services offered.

- **Interest-based advertising.** To learn about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org/choices>, the DAA's resources at www.aboutads.info/choices and/or Your Online Choices at www.youronlinechoices.com/uk.
- **Cross-device linking.** Please note that opting-out of receiving interest-based advertising through the NAI's and DAA's or Your Online Choices online resources will only opt-out a user from receiving interest-based ads on that specific browser or device, but the user may still receive interest-based ads on his or her other devices. You must perform the opt-out on each browser or device you use.
- **Mobile advertising.** You may also be able to limit interest-based advertising through the settings on your mobile device by selecting "limit ad tracking" (iOS) or "opt-out of interest based ads" (Android). You may also be able to opt-out of some – but not all – interest-based ads served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app.
- Some of these opt-outs may not be effective unless your browser is set to accept cookies. If you delete cookies, change your browser settings, switch browsers or computers, or use another operating system, you will need to opt-out again.

5. HOW WE STORE AND PROTECT YOUR INFORMATION

Data storage and transfer: Your information collected through our website may be transferred to, stored and processed in other countries, including those outside the European Union, in which ITC Ltd or its affiliates or service providers maintain facilities. Please note that these internal and external international transfers of your personal information are made pursuant to appropriate safeguards, namely standard data protection clauses adopted by the European Commission. If you wish to enquire further about these appropriate safeguards, please contact us using the details set out at section 9 below.

Keeping your information safe: Security of your information is very important to us, and we have put in place safeguards to preserve the integrity and security of information we collect and that we share with our service providers. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

6. DISCLOSURE OF YOUR INFORMATION

We will share your personal information with the following categories of recipients for the purposes set out in the Annexes:

- **Third parties at your request:** you may choose to share your activities on ITC Ltd with your friends through email, text or on various social media networks.
- **Promotional partners:** third parties with whom we partner to provide contests and sweepstakes, or other promotional activities, which will usually be identified by name in the Official Rules of the contest or sweepstakes.
- **Select third parties:** third parties, so that they can provide you with information and marketing messages about products or services that may interest you. To opt-out of our sharing your personal information with such companies, email info@itc-ltd.co.uk

- **Service providers and advisors:** third party vendors and other service providers that perform services for us, on our behalf, which may include identifying and serving targeted advertisements, providing mailing or email services, tax and accounting services, product fulfilment, payments processing, data enhancement services, fraud prevention, web hosting, or providing analytic services.
- **Suppliers:** personal information may be shared with our product suppliers for logistical purposes and to improve distribution, for resolving warranty and related issues in the event of a recall or rebate of a product, and in connection with trade shows we host where the supplier is an exhibitor.
- **The public:** when you provide feedback or post user content on our site. For example, if you post a product review on our website or a comment on our social media sites, your information, such as your first name, last initial, state of residence, and your comments, may be displayed on our website or on our social media pages.
- **Purchasers and third parties in connection with a business transaction:** personal information may be disclosed to third parties in connection with an ITC Ltd transaction, such as a merger, sale of ITC Ltd assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by a third party, or in the event of a bankruptcy or related or similar proceedings ; and
- **Law enforcement, regulators and other parties for legal reasons:** third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of ITC Ltd , our visitors, or others.

7. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

In addition to the ways in which you can manage the use of your data as outlined in section 4 above, you have the following specific rights under applicable privacy law in respect of your personal information that we hold:

- **Right of access.** The right to obtain access to your personal information along with certain related information;
- **Right to data portability.** The right to receive your personal information in a commonly used format and to have your personal information ported to another data controller;
- **Right to rectification.** The right to obtain rectification of your personal information without undue delay where that personal information is inaccurate or incomplete;
- **Right to erasure.** The right to obtain the erasure of your personal information without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed.
- **Right to restriction.** The right to obtain the restriction of the processing undertaken by us on your personal information in certain circumstances, such as where the accuracy of the personal information is contested by you, for a period enabling us to verify the accuracy of that personal information; and
- **Right to object.** The right to object, on grounds relating to your particular situation, to the processing of your personal information, and to object to processing of your personal information for direct marketing purposes, to the extent it is related to such direct marketing. If you wish to exercise one of these rights, please contact us using the details set out at section 9 below. You also have the right to lodge a complaint to the Information Commissioner's Office.

8. LINKS TO OTHER WEB SITES AND SERVICES

The Services may contain links to and from third party websites of our business partners, advertisers, and social media sites and our users may post links to third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on the websites of third party sites.

9. HOW TO CONTACT US

If you have any questions about this Privacy Policy or the website, please contact the Data Protection Officer at info@itc-ltd.co.uk

10. CHANGES TO OUR PRIVACY POLICY

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and you should review this page periodically. We will update the 'last modified' date at the bottom of this page when we post changes to this Privacy Policy. Where we have your email address, we will notify you of any

material changes to this policy. If you object to any changes, you may close your account. Continuing to use our Services after we publish changes to this Privacy Policy means that you have read and understood the changes.

Effective date: 25 May 2018.

ANNEX 1 – PERSONAL INFORMATION WE COLLECT

Category of personal information	How we use it	Legal basis for the processing	Retention period
<p>Contact and profile information. Personal information, such as your name, phone number, address, business information, and email address, when you register for our Service, sign up for our mailing list, enter a contest, redeem a promotion, or enter a sweepstakes, or otherwise communicate or interact with us</p>	<p>To create your account and to communicate with you directly about the Service.</p>	<p>The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.</p>	<p>7 years following your last login or other interaction with us (e.g. financial transaction).</p>
	<p>To communicate with you including to answer any questions, issues or concerns you or other users have.</p>	<p>The processing is necessary for our legitimate interests, namely communicating with users.</p>	
	<p>To send you marketing communications in accordance with your preferences.</p>	<p>The processing is necessary for our legitimate interests, namely marketing purposes.</p>	
<p>Comments, chat and opinions. When you contact us directly, e.g. by email, phone, mail or by completing an online form or participating in online chat, we will record your comments and opinions. We will also record comments and opinions you express when responding to surveys, entering a sweepstakes or taking part in promotions we run.</p>	<p>To address your questions, issues and concerns and improve our products and services. We may also use your comments and opinions to determine products and services that may be of interest to you and to send you marketing communications in accordance with your marketing preferences.</p>	<p>The processing is necessary for our legitimate interest, namely for marketing purposes and communicating with users.</p>	<p>7 years following your last login or other interaction with us (e.g. financial transaction).</p>
<p>Payment and transaction information. Information such as items purchased, date and time of your transaction, and payment information, such as your credit card or bank account details, when you make purchase (in-person, phone, email).</p>	<p>To complete the transaction, detect and prevent fraud, and inform our advertising and marketing.</p>	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> •the performance of a contract; •our legitimate interests, namely the detection and prevention of fraud and for marketing purposes. 	<p>7 years from the date of the payment or transaction.</p>

<p>Location Information. Information about your location. If you provide our mobile applications access to location services on your device, we and our third party providers may collect location data through GPS, Wi-Fi, wireless network triangulation or other methods. We may also approximate your location based on your IP address.</p>	<p>We use your location information to provide personalized content and advertising, to enhance your online experience, to assist us with analytics, and to improve the effectiveness of our websites, mobile applications, merchandise, advertising, and customer service.</p>	<p>The processing is necessary for our legitimate interest, namely to tailor our service to the user and to improve our service generally.</p>	<p>This data is updated on a continuous basis.</p>
<p>Information provided by social networks. When you interact with our Service through various social media networks, such as when you Like us on Facebook or when you follow ITC Ltd or share ITC Ltd content on Facebook, Twitter, Snapchat, LinkedIn, Instagram or other sites, we may receive information from those social networks including your profile information, picture, user ID associated with your social media account, friends list, and any other information you permit the social network to share with third parties.</p>	<p>We use this information to communicate or interact with you on the social network, to better understand the demographics of our visitors, and to personalize content and advertising. The data we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third party websites and social media networks and services before linking or connecting them to our website or Service.</p>	<p>The processing is necessary for our legitimate interest, namely to tailor our service to the user and to improve our service generally.</p>	<p>7 years from the date of the payment or transaction.</p>
<p>Preferences. Preferences set for notifications, marketing communications and how our site is displayed.</p>	<p>We use this information to provide notifications, send marketing communications and display our site in accordance with your choices.</p>	<p>The processing is necessary for the performance of a contract.</p>	<p>7 years from the date of the payment or transaction.</p>
<p>Device ID. Users who take part in our Android modules, will have their Device ID logged.</p>	<p>We use this information to log issues.</p>	<p>The processing is necessary for our legitimate interest, namely ensuring the user received the correct marketing communications.</p>	<p>7 years from the date of the payment or transaction.</p>

<p>Information provided by third parties. From time to time, we may receive information about you from third parties and other users. For example we may obtain information from our suppliers, resellers, marketing partners, and other business partners or from other members of your company or organization. We may obtain information from third parties to enhance or supplement our existing user information. For example, we may obtain mailing address information or we may work with third party partners who help us determine a location based on your IP address so that we are able to customize content for your location. We may also collect information about you that is publicly available.</p>	<p>We may combine this information with the information we collect from you directly. We use this information to contact you, to send you advertising or promotional materials or to personalize our Service, to pre-populate online forms, and to better understand the demographics of our users.</p>	<p>The processing is necessary for our legitimate interest, namely to tailor our service to the user and to improve our service generally.</p>	<p>3 years from the date of the payment or transaction.</p>
<p>Information about fraudulent or criminal activity relating to your account.</p>	<p>We will use information about fraudulent or criminal activity relating to your use of our Service for the purposes of detecting and preventing fraud or abuse.</p>	<p>The processing is necessary for our legitimate interest, namely the detection and prevention of fraud.</p>	<p>7 years from the date of the payment or</p>
<p>All personal information set out above.</p>	<p>We will use all the personal information we collect to operate, maintain and provide to you the features and functionality of the Service, to communicate with you, to monitor and improve our Service and business, and to help us develop new products and services.</p>	<p>The processing is necessary for our legitimate interest, namely to improve our service.</p>	<p>As Above</p>

ANNEX 2 – PERSONAL INFORMATION COLLECTED AUTOMATICALLY

Category of personal information	How we use it	Legal basis for the processing	Retention period		
<p>Information about how you access the Service. For example, the site from which you came and the site to which you are going when you leave our website, how frequently you access the Service, whether you open emails or click the links contained in emails, whether you access the Service from multiple devices, and other actions you take on the Service.</p>	<p>We, or the third party partners we use, may use the data collected through tracking technologies to:</p> <p>a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site;</p>	<p>The processing is necessary for our legitimate interests, namely: to tailor our service to the user and to improve our service generally; to monitor and resolve issues; for marketing purposes; to communicate with users; to contact users; and for the detection and prevention of fraud.</p>	<p>This data is updated on a continuous basis. Records of information collected automatically are deleted within 1 month of collection.</p>		
<p>Information about how you use the Service. For example, the pages you visit, the links you click, the ads you view and click on, purchase information and your checkout process, your location when you access or interact with our Service, and other similar actions.</p>	<p>b) provide custom, personalised content and information, including targeted content and advertising;</p> <p>c) identify and contact you across multiple devices;</p>				
<p>Information about the computer, tablet, smartphone or other device you use. Such as your IP address, browser type, Internet service provider, platform type, device type/model/manufacture, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device or your account (including, for example, a persistent device identifier or an Ad ID), and other such information.</p>	<p>d) provide and monitor the effectiveness of our Service;</p> <p>e) perform analytics and detect usage patterns on our Service;</p> <p>f) diagnose or fix technology problems;</p>				
<p>Analytics information. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service and to understand more about the demographics and behaviors of our users</p>	<p>g) detect or prevent fraud or other harmful activities, and</p> <p>h) otherwise to plan for and enhance our service.</p>				

ANNEX 3 – THIRD PARTY TRACKING TECHNOLOGIES

We will strive to update this list if or when we work with new partners which offer you a choice about the collection of your information, but as partners change and new technologies become available, this list is likely to change over time and may not always reflect our current partners.

Third Party Partner	Partner Product	Type of Tracking Technology	Description
Google	Google Analytics and Advertising	Site analytics and advertising	<p>We use Google Analytics and Google Universal Analytics to recognize you and link the devices you use when you visit our site or Service on your browser or mobile device, login to your account on our Service, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google Universal Analytics to facilitate the service. Google Analytics allows us to better understand how our users interact with our Service and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's site "How Google uses data when you use our partners' sites or apps" located at www.google.com/policies/privacy/partners/. You can learn about Google Analytics' currently available opt- outs, including the Google Analytics Browser Ad-On here https://tools.google.com/dlpage/gaoptout/</p> <p>We may also utilize certain forms of display advertising and other advanced features through Google Universal Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the Doubleclick advertising cookie) or other third party cookies together to inform, optimize, and display ads based on your past visits to the Service. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at https://google.com/ads/preferences or by vising NAI's online resources at http://www.networkadvertising.org/choices.</p>
Facebook	Facebook Custom Audience; Facebook Impressions; Facebook for Developers	Advertising and social media	Used to retarget to visitors across all their devices; tracking of served/viewed advert impressions; and to allow Facebook members to log on with their Facebook identity and, while logged in, can connect with friends via these media and post information and updates to their Facebook profile.
LinkedIn	LinkedIn Marketing Solutions	Advertising	Used to target users based on their profile and targeted to specific locations.