



## TT Electronics Privacy and Cookie Policy

### Introduction

TT Electronics respects your privacy and is committed to protecting your personal data. This privacy notice informs you as to how we collect, protect and use your personal data, which you provide to us via our website or other means, and informs you about your privacy rights and how the law protects you.

This privacy notice consists of the following sections:

1.	IMPORTANT INFORMATION AND WHO WE ARE
2.	THE DATA WE COLLECT ABOUT YOU
3.	HOW IS YOUR PERSONAL DATA COLLECTED
4.	HOW WE USE YOUR PERSONAL DATA
5.	DISCLOSURES OF YOUR PERSONAL DATA
6.	INTERNATIONAL TRANSFERS
7.	DATA SECURITY
8.	DATA RETENTION
9.	YOUR LEGAL RIGHTS
10.	USE OF COOKIES
11.	GLOSSARY

### 1. Important information and who we are

#### Controller

TT Electronics is made up of different legal entities, details of which can be found at the Glossary. This privacy notice is issued on behalf of the TT Electronics Group so when we mention "Company", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the TT Electronics Group responsible for processing your data. TT Electronics PLC is the controller and responsible for this website.

If you have any questions about this privacy notice or the use of your personal data, please contact us using the details set out below.

#### Contact details

Full name of legal entity: TT Electronics PLC

Contact: Group Legal Department

Email address: [compliance@ttelectronics.com](mailto:compliance@ttelectronics.com)

Postal address: TT Electronics, Fourth Floor, St Andrews House, West Street, Woking, GU21 6EB, England

Registered Company Number: 87249

Data protection registration with the UK Information Commissioner's Office: ZA209272

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.

### **Changes to the privacy policy and your duty to inform us of changes**

This version was last updated on 25 March 2019. We will update this policy from time to time to take account of changes in law and updates to good practice.

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.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications, which may also use cookies. 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 notice and cookie policy of every website you visit.

### **Specific privacy notices**

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 the other notices and is not intended to override them.

## **2. The data we collect about you**

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 follows:

- **Identity Data** may include first name, last name, username or similar identifier title and date of birth.
- **Contact Data** includes address, email address and telephone numbers.
- **Transaction Data** includes details about payments to and from you or an entity you work for and other details of products and services you have purchased from us, or investments made in the Company.
- **Technical Data** includes 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 this website.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us.

We may also collect and use **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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 notice.

### **If you fail to provide personal data**

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.

### **3. How is your personal data collected?**

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

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms, meeting with us in person including at trade fairs, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our services;
  - request product details / marketing to be sent to you;
  - enter a survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see section 10, Use of Cookies below for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:

- (a) analytics providers such as Google;
  - (b) advertising networks; and
  - (c) search information providers.
- Contact and Transaction Data from providers of technical, payment and delivery services (e.g. Dun and Bradstreet).
  - Identity and Contact Data from social media, data brokers or aggregators (e.g. LinkedIn).
  - Identity and Contact Data from publicly available sources (e.g. Companies House).

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with the company you work for or are representing.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register the company you work for or represent as a new customer / supplier / business partner	(a) Identity (b) Contact	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to conduct pre-contractual discussions)
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:	(a) Identity	(a) Performance of a contract with you

<p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Entering your data on our client relationship management system and using software based tools to analyse such data</p> <p>(d) to generate proposals for you</p>	<p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a survey, including through the use of third party survey providing services</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (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>To make suggestions and recommendations to you about</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>Necessary for our legitimate interests (to develop our</p>

goods or services that may be of interest to you	(c) Technical (d) Usage (e) Profile	products/services and grow our business)
Where you are an investor or potential investor in the Company to record your investment in the Company or to keep you updated with relevant information on the Company	(a) Identity (b) Contact (c) Transaction	Necessary for our legitimate interests (to keep our records updated, to develop our investor relations and provide applicable information in respect of the Company)

## Marketing

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 (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you have provided us with your details and, in each case, you have not opted out of receiving that marketing. You can opt out of such marketing at any time by using the contact details above.

## 5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- 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 notice.

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.

## 6. International transfers

We may share your personal data within the Company Group. This may 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 in accordance with the EU Model Contracts.

We may share your personal data with External third parties based outside the European Economic Area (**EEA**), so where applicable their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by applying appropriate contractual safeguards.

## **7. 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.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are the right to:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us using the contact details above.

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

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **10. Use of Cookies**

### What are Cookies?

Cookies are small data files stored on your computer when you visit certain websites. A cookie itself does not contain or collect personally identifiable information. On this website, TT Electronics plc makes use of cookies to personalise your experience and help us identify and resolve errors. Cookies set across TT Electronics plc's sites, set by the company or its third party partners, can be in the form of session or persistent cookies and may use different technologies, such as JavaScript or Flash.

If you would like to "opt out" of the cookies set by this website, this can be accomplished on a cookie-by-cookie basis subject to browser settings. Each browser is different, so check the 'Help' menu of your particular browser (or your mobile phone's handset manual) to learn how to change your cookie preferences. Please note, you may limit site operation or functions if you limit the cookies. For more information about cookies, visit: [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.aboutcookies.org](http://www.aboutcookies.org).

## Our Cookies Policy

To make full use of our website, enjoy the personalised features and ensure the website works to its full potential; your computer, tablet or mobile phone will need to accept cookies.

We use cookies to:

- (1) remember you when you visit this website to keep track of your browsing patterns and to build up a profile of how you and other users use the website;
- (2) make our website operate as efficiently as possible; and
- (3) administer services and/or information to you.

We may use both “session” cookies and “persistent” cookies on the website.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/policies/privacy/>.

## Third Party Cookies

Our website may contain links to other websites. Some of these third parties generate their own cookies, but we don't have access to these cookies. We are not responsible for the privacy policies or practices of third party websites. Examples of third parties that we may link to include:

(1) Social networks: On our website we may use social networking icons or link to our social media presence (e.g. LinkedIn), and sometimes embed video content from websites such as YouTube. As a result when you visit a page with content embedded from for example YouTube, or log onto a social network via the relevant icon on our website you may be presented with cookies from these websites. We do not control the dissemination of these cookies and you need to check with the applicable third party website for more information.

(2) Flash cookies: TT Electronics plc may occasionally use Flash files to deliver content to the site. To improve user experience, “flash cookies” as they are commonly known, are employed to provide features such as video auto-resume and for saving your preferences. Flash cookies are stored in your terminal much in the same way as cookies are, however it is not possible to manage them at browser level in the same way. More information including a tool to monitor, opt out and remove “flash cookies” is available at: [www.adobe.com/products/flashplayer/security](http://www.adobe.com/products/flashplayer/security). Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of desktop browsers.

## **11. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).



**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES

#### Internal Third Parties

Other companies in the Company Group acting as controllers or processors are set out in the table below.

<p><b>AB CONNECTORS LIMITED</b>  Abercynon  Mountain ash  Rhondda Cynon Taff  CF45 4SF  Wales  Registered Company Number: 1914199  Data protection registration: Z9876624</p>
<p><b>AB ELECTRONICS (SUZHOU) CO., LTD</b>  158-24 Hua Shan Road  Snd Suzhou  215129  China  Registered Company Number: 91320505782062491E  Data protection registration: n/a</p>
<p><b>ABTEST LIMITED</b>  Unit 1, Tregwilym Industrial Estate  Rogerstone  Newport  Gwent NP10 9YA  UK  Registered Company Number: 620992  Data protection registration: Z9876641</p>
<p><b>AERO STANREW LIMITED</b>  Unit 1 Gratton Way  Roundswell Business Park  Barnstaple  Devon EX31 3AR  UK  Registered Company Number: 464848  Data protection registration: ZA100216</p>
<p><b>AERO STANREW SARL</b>  60 Avenue De L'uma  La Soukra 2036  Tunisia  Registered Company Number: B0377902007  Data protection registration: n/a</p>
<p><b>BI TECHNOLOGIES CORPORATION</b>  120 S. State College Blvd. Suite #175  Brea, CA 92821  USA  Registered Company Number: 2027045  Details of any data protection registration: n/a</p>
<p><b>BI TECHNOLOGIES CORPORATION SDN BHD</b>  A-1445, Jalan Tanjung Api,</p>

<p>Kampung Selamat 25050 Kuantan Malaysia Registered Company Number: 21949 - T Details of any data protection registration: n/a</p>
<p>BI TECHNOLOGIES S.A. de C.V. Ave Circulo De La Amistad No.102 Parque Industrial Mexicali Iv Mexico Registered Company Number: BTE-941101-2T8 Details of any data protection registration: n/a</p>
<p>CLETRONICS N.A. INC. 2262 Port Centre Dr. Medina Ohio 44256 USA Registered Company Number: 6254678 Details of any data protection registration: n/a</p>
<p>INTERNATIONAL RESISTIVE COMPANY INC 4222 South Staples Street Corpus Christi TX 78411 USA Registered Company Number: 2101076 Details of any data protection registration: n/a</p>
<p>NEW CHAPEL ELECTRONICS LIMITED London Road Fairford Gloucestershire GL7 4DS United Kingdom Registered Company Number: 1352416 Details of any data protection registration: ZA209268</p>
<p>OPTEK TECHNOLOGY INC Optek Technology 1645 Wallace Drive, Suite 130 Carrollton Texas 75006 USA Registered Company Number: 2036102 Details of any data protection registration: na</p>
<p>SEMELAB LIMITED Coventry Road Lutterworth Leicestershire LE17 4JB United Kingdom Registered Company Number: 6649272 Details of any data protection registration: ZA209260</p>
<p>ROXSPUR MEASUREMENT &amp; CONTROL LIMITED Fourth Floor St Andrews House West Street Woking Surrey GU21 6EB United Kingdom Registered Company Number: 881547 Details of any data protection registration: ZA209256</p>
<p>TT ELECTRONICS ASIA PTE LTD 514 Chai Chee Lane</p>

<p>#02-10a Bedok Industrial Estate 469029 Singapore Registered Company Number: 199707044W Details of any data protection registration: n/a</p>
<p>TT ELECTRONICS GmbH Ergoldinger Str. 2b D84030 Landshut Germany Registered Company Number: HRB 10931 Details of any data protection registration: n/a</p>
<p>TT ELECTRONICS INTEGRATED MANUFACTURING SERVICES (SUZHOU) LTD 158-29 Hua Shan Road Snd Suzhou 215129 China Registered Company Number: 9132050572228210X3 Details of any data protection registration: n/a</p>
<p>TT ELECTRONICS INTEGRATED MANUFACTURING SERVICES LIMITED Tregwilym Industrial Estate Rogerstone Newport Gwent NP10 9YA United Kingdom Registered Company Number: 896672 Details of any data protection registration: Z9874103</p>
<p>TT ELECTRONICS INTEGRATED MANUFACTURING SERVICES, INC 3700 Lane Road Perry Ohio 44081-9563 USA Registered Company Number: 597365 Details of any data protection registration: n/a</p>
<p>TT ELECTRONICS LTD Newton Industrial Park Christchurch Barbados West Indies Registered Company Number: 2236 Details of any data protection registration: n/a</p>
<p>WELWYN COMPONENTS LIMITED Welwyn Electronics Park Bedlington Northumberland NE22 7AA United Kingdom Registered Company Number: 162480 Details of any data protection registration: Z8353634</p>
<p>Precision Inc. 1700 Freeway Boulevard Minneapolis MN 55430 USA Registered Company Number: IG-66 Data protection registration: n/a</p>
<p>Precision International Holdings Limited 16th Floor, Wing On Centre 111 Connaught Road Central Hong Kong</p>

<p>Registered Company Number: 725667 Data protection registration: n/a</p>
<p>Taishan Precision International Co. Limited 4/F No 132 Fu Cheng Avenue Taishan City China Registered Company Number: Data protection registration: n/a</p>
<p>TT Electronics IoT Solutions Limited Fourth Floor, St Andrews House, West Street Woking GU21 6EB UK Registered Company Number: 00236394 Data protection registration: Z4868523</p>
<p>STADIUM POWER LIMITED Fourth Floor, St Andrews House, West Street Woking GU21 6EB UK Registered Company Number: 02844194 Data protection registration: n/a</p>
<p>STADIUM IGT LIMITED Fourth Floor, St Andrews House, West Street Woking GU21 6EB UK Registered Company Number: 02164435 Data protection registration: n/a</p>
<p>STONTRONICS LIMITED Fourth Floor, St Andrews House, West Street Woking GU21 6EB UK Registered Company Number: 02270716 Data protection registration: ZA126490</p>
<p>STADIUM ASIA LIMITED Unit A, 3/F, Bamboos Centre 52 Hung To Road Kwun Tong Kowloon Hong Kong Registered Company Number: 161049 Data protection registration: n/a</p>
<p>Dongguan Arlec electrical products co. Limited 4th Building F Zone, Zheng Wei Science Park Dongkeng Town Dongguan City Guangdong China Registered Company Number: 91441900617687041J Data protection registration: n/a</p>

<p>Shanghai Hongbian electronics co. Limited  Room 404-A69  East of Building 1  29 Jia Tai Road  Shanghai  China  Registered Company Number: 91310115MA1K3AEE4W  Data protection registration: n/a</p>
<p>SGW Sweden AB  Gullfossgatan 3  16440  Kista  Sweden  Registered Company Number: 559049-6385  Data protection registration: n/a</p>
<p>Power Partners Inc  43 Broad Street Suite B206  Hudson  MA 01749  Registered Company Number: n/a  Data protection registration: n/a</p>

**External Third Parties**

- Service providers acting as processors who provide IT and system administration services or sales support and other commercial services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.