

Customer Privacy Notice (27/07/2018)

This Customer Privacy Policy governs the collection, disclosure and use of personal information and data relating to potential and existing customers and users of our goods and services ("you") of SPIT SAS. This Customer Privacy Policy provides you with details about the personal information we collect from you, how we use your personal information and your rights to control personal information we hold about you.

We are committed to your right to privacy and will only process personal information you provide to us in accordance with applicable data protection laws.

Please read this policy carefully as it explains the personal information we collect about you and how such personal information is handled. By your continued use of our services (including our websites and apps), you confirm that you have read, understood and agree to this Customer Privacy Policy in its entirety. If you do not agree to this Customer Privacy Policy in its entirety, you must not use our products or services. Please check back for updates regularly, as we may amend this Customer Privacy Policy from time to time.

If you have any questions about how we collect, store and use your personal information, please contact us by email at gdpr@spit.com.

The personal information we collect

The personal information that we may collect about you broadly falls into the following categories:

- Your name;
- Company Name;
- Payment processing information;
- Company or business postal address;
- Company or business email address;
- Business landline or mobile telephone number;
- Delivery details;
- As well as other non-sensitive personal information;
 - Your industry interests
 - Your job title or job role
 - Company business information

If you use our websites, we may also collect information about you or your computer when you browse to allow you to use the services available, and also collect anonymous information about you or your computer for analysis to support continual improvements to our products and services, as explained further in our legal mentions and in our Cookie Notice.

How we use your personal information

We use the personal information that we collect about you to respond to your enquiries for payment processing, for the provision of goods and services to you or to the company that you represent, and for providing continuing product care such as warrant and technical support. We also process your personal information where we are required to do so by law, and for the exercise or defence of legal claims.

From time to time, we may contact you for research purposes, or to tell you about our special offers and other services in accordance with your contact preferences. Where appropriate, we will obtain your consent to do so. If you no longer wish to receive communications from us, please follow the "unsubscribe" instructions provided in any of those communications.

If we intend on using your personal information for any other purpose, we will let you know how we intend to use it when it is captured.

We will only process your personal information for the specific purposes listed above or for any other purposes specifically permitted by law. Your personal information will only be processed to the extent that it is necessary for the specific purposes listed above.

Our legal basis for processing your personal information

We will only process your personal information where you have consented (which you may withdraw after giving it if we are relying on consent as a legal basis), in order to perform a contract with you, or where the processing is necessary for our legitimate interests or the legitimate interests of others, for example, for market research purposes or, where you are an existing customer or user, to promote our goods and services.

How long we retain your personal information

We will only retain personal information if it is required for a specific purpose. We have a statutory duty to keep certain records for a specified minimum period, for example personal information in relation to the purchase of a product or service from SPIT SAS. We will retain your personal information as long as necessary to provide the services, products and information you request, or as permitted by applicable law and in line with our retention policy, applied under GDPR. We will also retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Information that is no longer required for any valid business purpose, and that we are not required to keep pursuant to any applicable law, will be routinely destroyed by secure means.

Who we share your personal information with

We may share your personal information with the following categories of recipients:

- Our **group companies, third party services providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- Any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- A **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- **Any other person with your consent** to the disclosure.

We may transfer your personal information to our associated entities and other members of our group of companies (including our parent company, Illinois Tool Works Inc., in the US).

Please be aware that countries outside of the European Economic Area (EEA) may not offer the same level of data protection as a country within the EEA. We ensure that we have a relevant data processing agreement in place with each third party outside the EEA to ensure they are compliant with privacy and data protection laws. We will make sure that any transfer of your personal information by us will be secured and/or encrypted for its protection.

How we protect your information

We use reasonable and appropriate administrative, technical, and organisational measures to safeguard personal information against loss, theft and unauthorised uses, access, disclosure, modifications or destruction. Certain areas of our websites may be password protected. If you are a user of our websites and have a password, you can help to preserve your privacy by ensuring that you do not share your password with anyone else.

Choices you have about how we use your information

You have the following rights under data protection laws:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below [\[link\]](#).

- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below [link].
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below [link].
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

These rights may not apply in some cases, including where we must comply with legal requirements, where it would violate the rights of someone other than the individual requesting access, or (in the case of your right to request access to your personal information) where the request is manifestly unfounded or excessive.

If you would like to request access to, correction, amendment, or deletion of your personal information, please contact us using one of the methods below. We may request specific information from you to confirm your identity. In certain circumstances, for instance if you request substantial copies of documents, we may charge a reasonable fee.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following details: e-mail : gdpr@spit.com

The data controller of your personal information is SPIT SAS.