



## **PRIVACY POLICY**

Factory Plant Projects attach great importance to the protection of your personal data and in this Privacy policy we explain how we use personal data. We are members of the Information Commissioner's Office (ICO) and comply in all cases with the applicable privacy laws, including the General Data Protection Regulation (AVG). This means that in any case we:

- use your personal data in accordance with the purpose for which they were transmitted, these purposes and type of personal data are described in this Privacy Policy;
- limit the processing of your personal data to only those data which are needed for the purposes for which they are processed;
- will ask for your explicit consent if it is needed to process your personal data;
- have implemented appropriate technical and organisational measures to protect your personal data;
- do not pass on personal data to third parties, unless this is necessary for the application of the purposes for which they were transmitted.
- will make you aware of the rights you have regarding the processing of your personal data

### **What personal data do we process?**

We process the personal data you have transmitted to us, for instance in the context of the services delivered to you or were obtained by us because you used our website and/or filled out a contact form. The personal data from you that we process can include the following:

- your name
- your address
- contact details, such as your phone number and email address
- other data, such as details about your account at Twitter, LinkedIn or other social media
- the IP-address of the computer you used to visit our website (see also our cookie statement)

### **Specified Purposes**

We use your personal data for a number of different purposes. They are as follows.

1. a) The performance of a contract.

Explanation:

When you enter into a contract with us we ask for your contact details. These may also be used for invoicing.

1. b) Maintaining contact with you.

Explanation:

Your contact details are kept in our customer system and may be used, among other things, for sending newsletters, updates, invitations to events and seminars and to send information requested by you.

1. c) To improve our services information and to conduct targeted marketing actions.

Explanation:

We like to provide you with relevant information. For that purpose we analyse the following data:

- i) Interaction data: Personal data obtained from contact between Factory Plant Projects Ltd and you, for instance via our website.
- ii) Behavioural data: Personal data that Factory Plant Projects Ltd processes about your behaviour, such as your preferences, opinion, wishes and needs. We can glean these data from e.g. your surfing behaviour on our website or because you asked for information. See also “use of cookies”.

1. d) To analyse the use of our website.

Explanation:

The user statistics enable us to gain insight in e.g. the number of visitors, the duration of their visit and which pages of the website are viewed. It concerns gathering generic data, without information about persons. We use the information obtained to improve our website.

1. e) Improving our website and making it secure.

### **Legal basis of the processing**

We only process personal data if there is a legal basis for it. The legal bases by virtue of which we process personal data are:

- Consent
  - If we have asked for your consent to process your personal data and you have granted this consent, you are always entitled to withdraw this consent at any time.
- On the basis of an agreement or in the run-up to the conclusion of an agreement
  - If you entered into an agreement with us we will process your personal data if and insofar this is necessary to complete the assignment.
- A legitimate interest
  - We may also process personal data if we have a legitimate interest and in doing so we are not disproportionately violating your privacy. For instance, we may use your contact details to invite you to relevant meetings.

### **Third parties engaged by us (processors)**

We may engage service providers (processors) to – on our behalf only – process your personal data. We conclude a processing contract with these processors. This processing contract stipulates, among other things, that the processors act solely on our instructions and may not use the personal details for their own purposes.

Processors we may use are parties that provide and host the software used by us. We also engage ICT service providers to manage our IT network. We also use the service of third parties for the distribution of newsletters.

### **Provision of personal data to third parties**

For the purpose of our service provision it may be necessary to share personal data. Your personal data are not shared with third parties for commercial purposes.

To send out email newsletters we use service providers (processors) from outside the European Economic Area (EEA).

These parties guarantee a suitable level of protection of personal data. In our contractual relationship with this processor we use model contracts that are approved by the European Commission (Decision 2010/87 / EU) as providing adequate protection.

### **Your rights**

Pursuant to the law every person can exercise certain rights with respect to his or her personal data. For instance, you have the right to demand inspection, rectification and or removal of personal data. You may also object to the use of your details or ask to limit this use. In certain cases you can even retrieve your data and transfer them to another party. For all of these questions, please contact us via our phone number or [info@factoryplant.com](mailto:info@factoryplant.com).

### **Retention period**

We keep your personal data as long as we need them for the purpose for which we obtained them, unless a statutory retention period applies.

### **Contacting us**

We welcome any queries, comments or requests you may have regarding this Privacy Policy. If you have any complaints about the way we use your personal data, you can contact us by sending an email to [info@factoryplant.com](mailto:info@factoryplant.com) or by phoning us. We will be happy to help you finding a solution.

This Privacy Policy Statement is to be reviewed for continuing suitability and shall be communicated to, understood and followed by all personnel at all levels employed by the company.

Signed: 

Managing Director

Date: 25.05.18

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