



General Privacy Notice

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General Privacy Notice

Introduction

This Privacy Notice is addressed to:

- Customers and Suppliers with whom Motion Control Products create or maintain a relationship;
- Customers or prospective customers who are natural persons
- The representatives or contact persons of our customers or prospective customers who are legal entities

The purpose of this notice is to advise all customers, potential customers, suppliers and any other entities Motion Control Products begin or maintain a working relationship with that Motion Control Products may process information about you which constitutes “personal data” and Motion Control Products consider the protection of your personal data and privacy a very important matter.

Motion Control Products are responsible for the processing of your personal data as it decides why and how it is processing, thereby acting as the “controller”. In this Privacy Notice, “we” or “us” refers to Motion Control Products.

We invite you to carefully read this Privacy Notice, which sets out in which context we are processing your personal data and explains your rights and our obligations when doing so.

Should you have any further questions in relation to the processing of your personal data, we invite you to contact enquiries@motioncontrolproducts.com

Information Motion Control Products Hold and Access

This information may either be directly provided by you, by your business partners or third parties or be obtained through trusted publicly available sources. We collect various types of personal data about you, including:

- general and identification information (e.g. name, first name, last name, gender, email and/or postal address, fixed and/or mobile phone number);
- function (e.g. title, position, name of company, as well as, for healthcare professionals, specialties, publications, congress activities, awards, biography, education, links to universities, expertise and participation in/contribution to clinical trials, guidelines, editorial boards and organisations);
- payment information (e.g. credit card details, bank account details, VAT or other tax identification number);
- unique IDs and profiles (if any) of our business partners;
- electronic identification data where required for the purpose of delivering products or services to our company (e.g. login, passwords, badge number and picture, IP address, online identifiers/cookies, logs, access and connection times, CCTV footage);
- information regarding utilisation, responses and/or preferences including in terms of types of messages discussed, channels of communication and frequency;
- data provided to us; and
- data which relate to our products and services

If you provide us with personal data about other individuals (e.g. staff), you must make this Privacy Notice available to them.

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Purpose and Justification of the Data Held

Legal basis for the processing

We will not process personal data if we do not have a proper justification foreseen in the law for that purpose. Therefore, we will only process personal data if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations; or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

Please note that, when processing your personal data on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy. Examples of such 'legitimate interests' are data processing activities performed:

- To develop a transparent and professional relationship with you;
- To benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers to process data);
- To offer our products and services to our customers;
- To prevent fraud or criminal activity, misuse of our services as well as the security of our IT systems, architecture and networks;
- To sell any part of our business or its assets or to enable the acquisition of all or part of our business or assets by a third party; and

For more information on our specific interests, please contact us as indicated below.

Purposes of the processing

We always process personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. We process personal data for the following purposes:

- manage our relationship with you;
- implement tasks in preparation of or to perform existing contracts;
- evidence transactions and ensure transparency on transfers of value;
- provide you with appropriate, adequate and updated information about our services;
- improve the quality of our interactions and services by adapting our offering to your specific needs;
- answer your requests and provide you with efficient support;
- manage, plan and execute communications and interactions with you;
- track our activities;
- manage our IT resources, including infrastructure management and business continuity;
- preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax and deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation);
- archiving and record keeping;
- billing and invoicing; and
- any other purposes imposed by law and authorities.

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Access and Whom the Data is Transferred

We will not sell, share, or otherwise transfer your personal data to third parties other than those indicated in this Privacy Notice.

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by, or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- our personnel;
- our suppliers and services providers that provide services and products to us;
- our IT systems providers, cloud service providers, database providers and consultants;
- our business partners who offer products or services jointly with us or with our subsidiaries or affiliates;

The above third parties are contractually obliged to protect the confidentiality and security of personal data, in compliance with applicable law.

Personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

The personal data we collect from you may also be processed, accessed or stored in a country outside the UK, which may not offer the same level of protection of personal data.

If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data by (i) applying the level of protection required under the local data protection/privacy laws applicable to the UK, (ii) acting in accordance with our policies and standards and, (iii) for entities located in the European Economic Area, unless otherwise specified, only transferring your personal data on the basis of standard contractual clauses approved by the European Commission. You may request additional information in relation to international transfers of personal data and obtain a copy of the adequate safeguard put in place by exercising your rights as set out in Section 6 below.

Protection of Your Personal Data?

We have implemented appropriate technical and organisational measures to provide a level of security and confidentiality to your personal data.

These measures take into account:

- the state of the art of the technology;
- the costs of its implementation;
- the nature of the data; and
- the risk of the processing.

The purpose thereof is to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access and against other unlawful forms of processing.

Moreover, when handling personal data, we:

- only collect and process personal data which is adequate, relevant and not excessive, as required to meet the above purposes; and
- ensure that your personal data remains up to date and accurate.

For the latter, we may request you to confirm the personal data we hold about you. You are also invited to spontaneously inform us whenever there is a change in your personal circumstances so we can ensure your personal data is kept up-to-date.

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How Long Do Motion Control Products Hold Your Data

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

Personal data which is not related to a specific contract will be stored for 24 months after your last interaction with us.

For contracts, the retention period is the term of your contract with us, plus the period of time until the legal claims under this contract become time-barred, unless overriding legal or regulatory schedules require a longer or shorter retention period. When this period expires, your personal data is removed from our active systems.

Personal data collected and processed in the context of a dispute are deleted or archived (i) after a settlement has been reached, (ii) once a decision in last resort has been rendered or (iii) when the claim becomes time barred.

Your Rights and How You Can Exercise Them

You may exercise the following rights under the conditions and within the limits set forth in the law:

- the right to access personal data as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your personal data or the restriction thereof to specific categories of processing;
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal;
- the right to object, in whole or in part, to the processing of your personal data;
- the right to object to a channel of communication used for direct marketing purposes; and
- the right to request its portability, i.e. that the personal data you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations.
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If you have a question or want to exercise the above rights, you may send an email to enquiries@motioncontrolproducts.com

If you are not satisfied with how we process your personal data, please address your request to our data protection officer at Lukemckay@motioncontrolproducts.com who will investigate your concern.

In any case, you also have the right to file a complaint with the competent data protection authorities, in addition to your rights above.

Communication of Changes to our Privacy Notice?

Any future changes or additions to the processing of your personal data as described in this Privacy Notice will be notified to you in advance through an individual notice through our usual communication channels.

Implementation, Monitoring and Review of this Document

This policy will take effect from 1st January 2023. The Managing Director has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation and may be changed from time to time.