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## WEBSITE PRIVACY POLICY

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### BACKGROUND:

Vantec Europe Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, [www.vantec-gl.com/uk](http://www.vantec-gl.com/uk) ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### 1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

<b>"personal data"</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the Data Protect Act 2018 and UK General Data Protection Regulation ("GDPR"); and
<b>"We/Us/Our"</b>	means Vantec Europe Limited a limited company registered in England under company number 02458961, whose registered address is 3 Infiniti Drive, Hillthorn Business Park, Washington, Tyne and Wear, NE37 3HG.

### 2. Information About Us

- 2.1 Our Site is owned and operated by Vantec Corporation, 4F Minatomirai Center Building, 3-6-1 Minatomirai, Nishi-ku, Yokohama, Kanagawa 2200012 Japan.
- 2.2 Our VAT number is GB569306809.
- 2.3 The person responsible for data protection is the Head of Legal, Compliance & Company Secretary (Abigail Curry) who can be contacted by email at [Abigail.curry@vanteceurope.com](mailto:Abigail.curry@vanteceurope.com) by telephone on 0191 4161133 or by post at the Company's Registered Office.
- 2.4 We are regulated by the Information Commissioner's Office.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

#### 4. **Your Rights**

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
  - 4.1.1 The right to be informed about Our collection and use of personal data;
  - 4.1.2 The right of access to the personal data We hold about you (see section 11);
  - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 12);
  - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 7 but if you would like Us to delete it sooner, please contact Us using the details in section 12);
  - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
  - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - 4.1.7 The right to object to Us using your personal data for particular purposes; and
  - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 12 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

#### 5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data:

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 business/company name
- 5.5 job title;
- 5.6 profession;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as post code,
- 5.9 IP address;
- 5.10 web browser type and version;
- 5.11 operating system;
- 5.12 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

## **6. How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
  - 6.2.1 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
  - 6.2.2 Personalising and tailoring Our services for you;
  - 6.2.3 Replying to emails from you;
- 6.3 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.4 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

## **7. How and Where Do We Store Your Data?**

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the UK/EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under GDPR.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

## **8. Do We Share Your Data?**

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.
- 8.2 We may share your data with other companies in Our group for purposes such as regulatory compliance, corporate planning, performance management, HR administration, whistle blowing, litigation, health and safety, governance, IT-system management. This includes Our parent company and its subsidiaries.
- 8.3 Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. **How Can You Control Your Data?**

9.1 You may wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. **Your Right to Withhold Information**

You may access certain areas of Our Site without providing any data at all.

11. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [hr@vanteceurope.com](mailto:hr@vanteceurope.com).

12. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [veu-governance\\_and\\_compliance@vanteceurope.com](mailto:veu-governance_and_compliance@vanteceurope.com) by telephone on 0191 4161133, or by post at the Company's registered office. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

13. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.