

PRIVACY STATEMENT

Introduction

Allied Glass Containers Limited respects your privacy and is committed to protecting your personal data. This Privacy Statement will inform you as to how we look after your personal data and tells you about your privacy rights and how the law protects you.

Purpose of this Privacy Statement

This Privacy Statement aims to give you information on how Allied Glass Containers Limited collects and processes your personal data, including any data you may provide through our website when you make an enquiry using our online enquiry form.

Data Controller

Allied Glass Containers Limited is the Data Controller and responsible for your personal data. We have appointed a Data Protection Manager who is responsible for overseeing questions in relation to this Privacy Statement. If you have any questions about this Privacy Statement, including any requests to exercise your legal rights, please contact the Data Protection Manager using the details set out below:-

Data Protection Manager
Allied Glass Containers Limited
Eurohub
California Drive
Whitwood
Castleford
WF10 5QH

Email: dataprotectionmanager@allied-glass.com
Telephone: 01132 451568

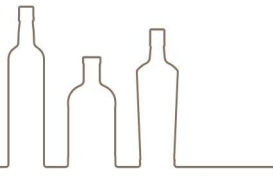
The Data we collect about you

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 as follows:

Identity Data: Including title, first name, surname

Contact Data : Including billing address, delivery address, email address and telephone numbers



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<i>Financial Data:</i>	Including bank account details, credit/financial history, credit references
<i>Transaction Data:</i>	Including details about payments to and from you
<i>Technical Data:</i>	Including internet protocol (IP) address, location, and platform
<i>Marketing Communications Data:</i>	Including your preferences in receiving marketing from us and your communication preferences.
<i>Usage Data:</i>	Including information about how you use our website.

We also collect, use, and share 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.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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.

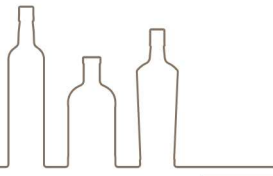
How is your Personal Data collected?

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

Direct Interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or via our website. This includes personal data you provide when:

- you apply for our products or services – set up of new customer account
- make an enquiry;
- request marketing to be sent to you, enter a competition, promotion, or survey, or give us some feedback;
- we set up a new supplier account.



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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, [server logs]. Please see our cookie policy below for further details.

Third Parties

We may receive personal data about you from various third parties and public sources as set out below:

Credit Insurer – Euler Hermes
Identity and Contact Data from Companies House
Contact, Financial and Transaction Data from BACS
Technical data from Google Analytics (based outside the EU)

How we use your Personal Data

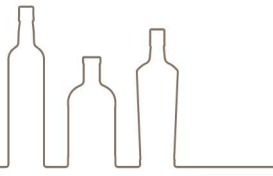
We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) 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

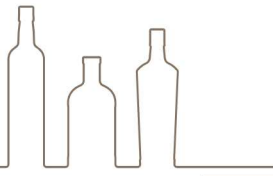
We have set out below, in a table format, a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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.



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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
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) Financial (d) Transaction (e) Marketing and communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To register you as a new supplier.	(a) Identify (b) Contact	Performance of a contract with you
To receive services from you including: (a) Manage payments, fees, and charges	(a) Identity (b) Contract (c) Financial (d) Transaction	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	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)



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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and communications.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us, or if you provided us with your details when you entered a competition and, in each case, you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing communications at any time by following the opt-out links on any marketing message sent to you or contacting us at marketing@allied-glass.com

Third Party Marketing

We do not share your personal data with any company outside of Allied Glass Containers Limited for marketing purposes.

Cookies

Information on our use of cookies is available below.

Third Party Links

Our website includes links to third party websites. Clicking on those links 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 Statements of every website you visit.

Change of Purpose

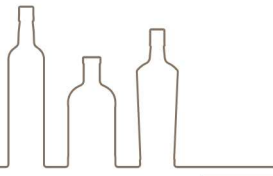
We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

Disclosure of your Personal Data

We may have to share your personal data with the third parties set out below for the purposes set out in the table (purposes for which we will use your personal data).



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- Professional advisers including lawyers, bankers, auditors, and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Fraud Prevention Agencies
- 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.

International Transfers

We do not transfer your personal data outside the European Economic Area (EEA).

Data Security

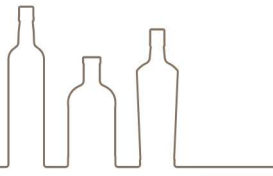
We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

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.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.



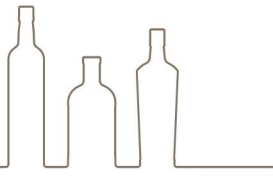
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Your Legal Rights

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

- **Request access** to your personal data (commonly known as a "data subject access request". This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of the request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground, as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

For further information on your rights, please refer to the ICO website at www.ico.org.uk



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If you wish to exercise any of the rights set out above, please contact:

Data Protection Manager
Allied Glass Containers Limited
Eurohub
California Drive
Whitwood
Castleford
WF10 5QH

Email: dataprotectionmanager@allied-glass.com
Telephone: 01132 451568

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

We do hope that you will not have reason to complain about our use of your personal data, however if you do have a complaint please contact us using the details set out above. We will look into and respond to any complaints that we receive.

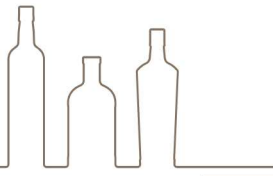
You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK data protection regulator. For further information on your rights and how to complain to the ICO please refer to their website at www.ico.org.uk

Changes to your Personal Data

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.

Changes to this Privacy Statement

We recognise that transparency is an ongoing responsibility, therefore we will keep this Privacy Statement under regular review. This Privacy Statement was last updated on 19th August 2020.



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COOKIES POLICY

Introduction

Allied Glass Containers Limited uses cookies on www.allied-glass.com.

Our Cookies Policy explains what cookies are, how we use cookies and your choices regarding cookies. Please read this Cookies Policy in conjunction with our Privacy Policy above, which sets out additional details on how we use personally identifiable information and your various rights.

What are Cookies?

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the site or a third party to recognise you and make your next visit easier and the site more useful to you. Essentially cookies are a user's identification card for the Allied servers. Web beacons are small graphic files linked to our servers that allow us to track your use of our site and related functionalities. Cookies and web beacons allow Allied to serve you better and more efficiently and to personalise your experience on our site.

How Allied Glass uses Cookies

When you use and access our site, we may place a number of cookies files in your web browser.

Allied Glass uses or may use cookies and/or web beacons to help us determine and identify repeat visitors, the type of content and sites to which a user of our site links, the length of time each user spends at any particular area of our site and the specific functionalities that users choose to use. To the extent that cookies data constitutes personally identifiable information, we process such data on the basis of your consent.

We use both session and persistent cookies on our site and we use different types of cookies to run the site.

Essential cookies: Necessary for the operation of the site. We may use essential cookies to authenticate users and prevent fraudulent use of user accounts.

Analytical/
Performance Cookies: Allow us to recognise and count the number of visitors and see how visitors move around the site when using it. This helps us improve the way the site works.

Your choices regarding cookies

If you would like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use some or all of the features we offer.