



## **GRIPPLE CANADA – PRIVACY NOTICE – SALES AND MARKETING**

**Last updated January 2024**

**This section of our website is designed to help you understand how we collect and what we do with information about individuals, held by our organisation, referred to as “personal information”.**

Gripple Canada Inc. and Gripple Limited (“we”, “us”, “our”) are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during the course of our relationship with you, in accordance with data protection law.

### **WHO ARE WE AND HOW TO CONTACT US**

This notice explains how we use personal information collected from or about individuals connected with customers and prospective customers and other individuals whose personal data may be captured by Gripple.

This privacy notice provides an overview of what personal information we collect and store about customers and prospective customers and how we use that personal information. This privacy notice also tells you what your rights are over your personal information and how to exercise those rights.

If you have any questions or concerns about the information in this notice, or about our handling of personal information more generally, or if you would like more detailed information on a particular point, you should contact the Data Protection Manager (who also acts as the Privacy Officer in charge of the protection of personal information in the province of Quebec) who can be contacted at [Canada-Dataprotection@gripple.com](mailto:Canada-Dataprotection@gripple.com). This position is held by Gripple Canada Inc.’s General Manager.

### **This privacy notice answers the following**

- How we use your personal information that we collect from your use of our website [gripple.com](http://gripple.com) and our legal basis for that
- How we use your personal information when you request a quotation or place an order with us and our legal basis for that
- How we use your personal information where you arrange to visit one of our sites and our legal basis for that
- How we use your personal information where we arrange on-site training for you and our legal basis for that
- How we use your personal information where we arrange CPD presentations for you and our legal basis for that
- How we use your personal information to market to you and our legal basis for that
- How we use your personal information when we create marketing materials which include videos, photographs, interviews and testimonials and our legal basis for that
- How we use your personal information when you enter one of our competitions, contests or promotions, take part in surveys or complete reviews (not collected via our website) and our legal basis for that
- How we use your personal information when we administer a warranty (not collected via our website) and our legal basis for that
- Will we change the way we use your personal information?
- Do we use your personal information to make automated decisions?
- How long will we keep your personal information?

- Who will we share your personal information with?
- Will we transfer your personal information, where applicable, outside the EEA , Canada/Quebec?
- How do we ensure that your personal information is secure?
- What rights do I have over my personal information?
- How will you tell me about changes to this privacy notice
- How you can contact us

## **HOW WE USE PERSONAL INFORMATION THAT WE COLLECT FROM YOUR USE OF OUR WEBSITE AND SOCIAL MEDIA CHANNELS AND OUR LEGAL BASIS FOR THAT**

### **1. What personal information do we collect and how do we use it?**

Information we collect via cookies: When you visit our website we will collect your personal information via cookies such as how you are using our website and information about the device you are using. We may use this information to improve our website and future marketing strategies. Further details of how we use cookies can be found in our Cookie Policy available on our [gripple.com](http://gripple.com) website.

Information you give us: If you fill in a form on our website, or contact us via email, telephone, live chat, or social media channels, we will collect the information you include on the form or which you provide to us when you contact us, such as your name and contact details. We will use this information to:

- send you the information you have requested, for example about our products and services; and
- respond to your query
- put one of our distributors in touch with you if your query relates to the supply of our products or services outside the UK, Canada or otherwise outside our own distribution network

IP addresses: When you visit our website we collect information about your computer, including your location and IP address. We will use this to improve our website and marketing activities.

Information we collect when you complete our warranty forms: Where applicable, if you complete our warranty forms, we will collect your name, business name and any other information which is on the relevant form and will use it to administer the warranty.

Information we collect when you set up a My Gripple account: If you set up a My Gripple account using our website we will collect your e-mail address, name, business name, job title, password, , addresses, telephone number and market area. We will use this information in order to give you access to our download library and technical documentation in relation to our products and services and we will also add your details to our marketing database in order to keep you up to date about our products, services, offers, competitions, contests, promotions, surveys and events.

Information we collect when you enter our competitions, contests or promotions or take part in surveys or complete reviews: If you enter one of our competitions, contests or promotions, take part in a survey or complete a review we will collect your full name, your e-mail address and any other information which is on the relevant form. We will use your personal information to enter you into and administer the competition, contest or promotion you have entered or analyse the results of the survey or review. In the case of competitions, contests or promotions, to the extent permitted by applicable law, this may include publishing your name and country location on our winners list. We will also indicate if by entering the competition, contest or promotion or taking part in the survey or completing the review we will include your details to our marketing database in order to keep you up to date about our products, services, offers, competitions, contests, promotions, surveys and events.

Information publicly available: If you contact us via social media channels, we may collect the information which is publicly available on those channels and use it to correspond with you directly. If your query relates to the supply of our products or services outside the UK or Canada

or otherwise outside our distribution network we will use your details to put one of our distributors in touch with you in order to assist you.

## **2. What is our legal basis for using your personal information?**

Under data protection law and Canadian private sector privacy legislation we must have a legal basis to use your personal information. We have set this out below.

Information we collect via cookies: When you visit our website we may collect non-personal information and your personal information via cookies such as how you are using our website and information about the device you are using. Apart from strictly necessary cookies which are required in order for the website to function we will request your consent to use cookies. We will process your personal information on the basis that it is in our legitimate interests to use strictly necessary cookies to allow our website to function. With respect to all other cookies we will process your personal information based on your consent to do so.

Information you give us: Where you fill in a form on our website, or contact us via email, telephone, live chat or social media channels, the legal basis for this use is that it is in our legitimate interests as a business to be able to respond to enquiries that we get. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this use is proportionate because we will only use the information we get from you to respond to your enquiry and it is in your reasonable expectations that we would need to use your personal information to be able to respond to you.

IP addresses: When you visit our website we collect information about your computer, including your location and IP address we will process your personal information on the basis that it is in our legitimate interests as a business to inform our marketing strategy.

Information you give us when you complete our warranty forms: Where applicable, if you complete a warranty form, we will process your personal information on the basis that it is in our legitimate interests as a business to administer the warranty and necessary to perform our contract with you.

Information we collect when you set up a My Gripple account: If you set up a My Gripple account we will process your information on the basis that you have consented for us to do so. You are able to opt out by contacting [unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or use the unsubscribe link at the end of any e-mail you receive from us.

Information you give us when you enter one of our online competitions, contests or promotions or take part in surveys or complete reviews: We will process your personal information collected through competitions, contests, promotions, surveys and reviews on the basis that you have consented for us to do so. You are able to opt out by contacting [unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or use the unsubscribe link at the end of any e-mail you receive from us.

## **HOW WE USE YOUR PERSONAL INFORMATION IF YOU REQUEST A QUOTATION OR PLACE AN ORDER WITH US AND OUR LEGAL BASIS FOR THAT**

### **1. What personal information do we collect and how do we use it?**

Information you give us: If you or your organisation requests a quotation from us or your organisation submits an order for products and/or services from us, we will collect information from you or from your organisation, such as your name, your contact details and your job title, your billing address, e-mail address, telephone, delivery address and where applicable, your VAT number or your Canada Revenue Agency business number. We will use this information to:

- provide the quotation your organisation has requested;
- negotiate and conclude contracts for the sale of products to your organisation;
- financial due diligence via credit reference checks, sanction checks and any other legal checks we are required to carry out prior to accepting an order
- fulfil an order placed with us;
- agree the specification and design of products ordered from us;
- assist with the ongoing management and running of a contract;
- resolve any operational issues such as in relation to delivery;
- arrange and carry out site visits;
- arrange delivery of the products; and
- assist with any contractual or other claims.

Information we receive from other sources to perform credit agency checks: We will carry out credit checks on our customer companies which may reveal information about company officers, directors and/or owners of organisations who are our customers or prospective customers.

We may carry out a due diligence process relating to anti-bribery, fraud and money laundering. We may also carry out sanctions checks against our customers, proposed customers and their company officers, directors and owners and will obtain personal information as part of this process.

## **2. What is our legal basis for using your personal information?**

Under data protection law we must have a legal basis to use your personal information. We have set these out below.

Information you/your organisation gives us when requesting a quotation, negotiating and concluding a contract: The legal basis for using the personal information you give or your organisation gives us when requesting a quotation, entering into negotiations or concluding a contract with your organisation is that it is in our legitimate interests as a business to be able to contact you to provide a quote and to manage and assist with the conclusion and ongoing performance of a contract with your organisation. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this use is proportionate because it is relevant and appropriate to our relationship with you, it is in your reasonable expectations that we would need to use your personal information to contact you in this way and we only use your business contact details for matters which relate directly to our relationship with the organisation you work for.

Information you give to us or which we get from other sources to perform credit agency checks: The legal basis for using the personal information you give to us or which we get from other sources to perform credit agency checks is that it is in our legitimate interests as a business to check the financial standing and credit of our customers in order to safeguard our finances and reputation. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that carrying out due diligence is proportionate because it is within your reasonable expectations, taking into account the value of the contract or potential contract being entered into, and the information is limited to the business context.

Information you give to us or which we get from other sources so that we can meet our legal obligations: The legal basis of using the personal information you give to us or which we get from other sources so that we can meet our legal obligations, for example carrying out anti-bribery, fraud, money laundering and sanctions checks, is that it is necessary for compliance with a legal obligation we are subject to under EU or Member State Law such as The Bribery Act 2010, The Anti-Money Laundering and Counter-Terrorism Financing Act 2006, Canada's Anti-Money Laundering and Anti-Terrorist Financing Regime and other legislation that we are bound by virtue of our corporate structure e.g. the Foreign Corrupt Practices Act of 1977.

## **HOW WE USE YOUR PERSONAL INFORMATION WHERE YOU ARRANGE TO VISIT ONE OF OUR SITES AND OUR LEGAL BASIS FOR THAT**

### **1. What personal information do we collect and how do we use it?**

Information we collect from you: As you will appreciate, as a manufacturer, our sites can be hazardous and ensuring the safety of our visitors is paramount. It is also important that we maintain our site security. If you arrange to visit our site we may therefore collect the following personal information from you: your name, contact details, your job title, car registration (if you travel by car to the site) and clothing/footwear size. We will use this information to:

- arrange the site visit;
- approve any cost related to the visit;
- carry out health and safety risk assessments relating to the site visit;
- provide you with appropriate personal protective equipment; and
- ensure site safety.

### **2. What is our legal basis for using your personal information?**

Under data protection law we must have a legal basis to use your personal information. We have set this out below.

Information we collect from you: We collect and use the personal information that you give to us for a site visit on the legal basis that it is in our legitimate interests as a business to verify who is coming on site, provide for site security, ensure that our visitors are safe and have appropriate protective clothing and equipment. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We do not consider that these legitimate interests have a disproportionate effect on your rights because the use of this personal information is within your reasonable expectations in relation to what is required for a site visit in potentially hazardous areas and we do not use this information for any other purpose other than arranging your site visit.

## **HOW WE USE YOUR PERSONAL INFORMATION WHERE WE ARRANGE ON-SITE TRAINING FOR YOU AND OUR LEGAL BASIS FOR THAT**

### **1. What personal information do we collect and how do we use it?**

Information you give us: If your organisation arranges for us to carry out training such as product installation training we will collect information from you as our contact at your organisation or as a participant in the training. This will be your name, business name, contact details, and job title. We will use this information to arrange, co-ordinate and deliver the training requested.

### **2. What is our legal basis for using your personal information?**

Under data protection law we must have a legal basis to use your personal information. We have set this out below.

Information you give us: We are collecting and using the personal information that you give to us on the legal basis that it is in our legitimate interests as a business to arrange and carry out the training that your organisation has requested. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We do not consider that this use has a disproportionate effect on your rights because the use of personal information is within your reasonable expectations when you arrange training and we do not use this information for any other purpose.

## HOW WE USE YOUR PERSONAL INFORMATION WHERE WE ARRANGE CPD PRESENTATIONS FOR YOU AND OUR LEGAL BASIS FOR THAT

### 1. What personal information do we collect and how do we use it?

Information you give us: If you attend a CPD presentation we will collect information from you as an attendee of the CPD presentation. This will be your name, business name, contact details, and job title. We will use this information to arrange, co-ordinate and deliver the training requested, record your attendance and obtain feedback to evaluate the presentation.

### 2. What is our legal basis for using your personal information?

Under data protection law we must have a legal basis to use your personal information. We have set this out below.

Information you give us: We are collecting and using the personal information that you give to us on the legal basis that it is in our legitimate interests as a business to arrange and carry out the CPD presentation you attend, record your attendance and obtain feedback on the presentation. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We do not consider that this use has a disproportionate effect on your rights because the use of personal information is within your reasonable expectations when you attend a CPD presentation and we do not use this information for any other purpose unless you agree for your details to be added to our marketing database.

## HOW WE USE YOUR PERSONAL INFORMATION TO MARKET TO YOU AND OUR LEGAL BASIS FOR THAT

### 1. What personal information do we collect and how do we use it?

Information you give us (i) through our website or (ii) when you create an account for access to My Gripple, (iii) register a warranty, (iv) enter competitions, contests or promotions, (v) complete surveys, (vi) provide reviews or (vii) request free samples: When you fill the newsletter sign up form on our website, complete feedback forms for presentations or training, create an account for access to My Gripple, enter competitions, contests or promotions, complete surveys, provide reviews or request free samples, we ask whether you would like to receive information about our products, services, offers and events and will ask for your business e-mail address, business telephone, first and last name, business name, business address and business type. We will keep your details to provide you with marketing updates. If you would like to stop receiving these updates please contact [unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or use the unsubscribe link at the end of any e-mail you receive from us.

Information you give us when you (i) request information about our products or services at an event or meeting or via email, telephone or social media channels (ii) request a quotation, or (iii) request a site visit: If you request information about our products or services at an event, meeting or via email, telephone or social media channels, request a quotation, or request a site visit, we will respond to your request and, to the extent permitted by applicable law, may keep your details to provide you with marketing updates and inform you of any products which might be of interest. If you would like to stop receiving these updates please contact [unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or use the unsubscribe link at the end of any e-mail you receive from us.

Information you give us when you purchase products and/or services on behalf of your business: If your organisation purchases products and/or services, we will fulfil the order and we may keep your details to provide you with marketing updates and inform you of any products which might be of interest. If you would like to stop receiving these updates please contact

[unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or use the unsubscribe link at the end of any e-mail you receive from us.

Information you give to us when you register to attend a presentation or training, register to attend an event or accept a hospitality invitation: When you register to attend a presentation or training, register to attend an event or accept a hospitality invitation, we may keep your details to provide you with marketing updates and inform you of any products which might be of interest. If you would like to stop receiving these updates please contact [unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or use the unsubscribe link at the end of any e-mail you receive from us.

Sales lists which we have purchased from third parties: We may purchase lists of sales opportunities from reputable third parties. We use these lists to make live marketing calls and we screen against any relevant do not call lists and our own do not call list of people who have previously objected to or opted out of our calls. If you do not want to be contacted please notify us during the call or by contacting [unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or using the unsubscribe link at the end of any e-mail you receive from us.

## **2. What is our legal basis for using your personal information?**

Under data protection law we must have a legal basis to use your personal information. We have set this out below.

Where we use your personal information for marketing, we do this on the basis that it is in our legitimate interests to provide registered companies and customers with marketing communications. Where we cannot rely on legitimate interests to use your personal information we will ask for your consent and rely on this basis to process your information. You have the right to notify us that you do not want to receive marketing communications at any time and can do so by contacting [unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or using the unsubscribe link at the end of any e-mail you receive from us.

## **HOW WE USE YOUR PERSONAL INFORMATION WHEN WE CREATE MARKETING MATERIALS WHICH INCLUDE VIDEOS, PHOTOGRAPHS, INTERVIEWS AND TESTIMONIALS AND OUR LEGAL BASIS FOR THAT**

### **1. What personal information do we collect and how do we use it?**

If you consent to being filmed or photographed as part of our marketing activities, we will collect your image via the filming or photographing of you and may also include your name and job title. We only use this personal data with your consent and only for the purposes of marketing our products.

You may also feature in the background of filming or photographs we take on a site where our products are used.

### **2. What is our legal basis for using your personal information?**

Under data protection law we must have a legal basis to use your personal information. We have set this out below

We will only use your personal information obtained during filming or photography with your consent, which we record via our consent form. You can withdraw your consent at any time. However if you do withdraw your consent this will not affect the lawfulness of any materials already published. Gripple will as soon as reasonably practical remove materials published on its website and social media channels but will be under no obligation to remove publications on third party sites or in printed publications.

If we capture images of one or more individuals in the background where we are filming or taking photographs, we will rely on our legitimate interest to create marketing materials which may include incidental images of individuals in public places but only having taken into account the balance of interests between Gripple and the individuals whose personal data we have recorded. We ensure that appropriate information notices are placed prominently at sites where we are filming or taking photographs. These will include a point of contact if individuals do not wish to be filmed or photographed. Individuals may request that we do not use their images in our marketing materials but it will not always be possible to remove incidental images of individuals included in the background of our materials.

## **HOW WE USE YOUR PERSONAL INFORMATION WHEN YOU ENTER ONE OF OUR COMPETITIONS, TAKE PART IN SURVEYS OR COMPLETE REVIEWS ( NOT COLLECTED VIA OUR WEBSITE) AND OUR LEGAL BASIS FOR THAT**

### **1. What personal information do we collect and how do we use it?**

If you consent to enter our competitions, contests or promotions, take part in surveys or complete reviews, we will collect your full name, your e-mail address and any other information which is on the relevant form. We will use your personal information to enter you into and administer the competition, contest or promotion you have entered or analyse the results of the survey or review. In the case of competitions, contests or promotions this may include publishing your name and country location on our winners list. We will also indicate if by entering the competition, contest or promotion, taking part in the survey or completing the review we will include your details to our marketing database in order to keep you up to date about our products, services, offers, competitions, contests ,promotions surveys and events.

### **2. What is our legal basis for using your personal information?**

Under data protection law we must have a legal basis to use your personal information. We have set this out below.

We will process your personal information collected through competitions, contests, promotions, surveys and reviews on the basis that you have consented for us to do so. You are able to opt out by contacting [unsubscribe@gripple.com](mailto:unsubscribe@gripple.com) or use the unsubscribe link at the end of any e-mail you receive from us.

## **HOW WE USE YOUR PERSONAL INFORMATION WHEN WE ADMINISTER A WARRANTY (NOT COLLECTED VIA OUR WEBSITE) AND OUR LEGAL BASIS FOR THAT**

### **1. What personal information do we collect and how do we use it?**

Information you give us: If you complete our warranty forms, we will collect your name, business name and any other information which is on the relevant form and will use it to administer the warranty.

### **2. What is our legal basis for using your personal information?**

Under data protection law we must have a legal basis to use your personal information. We have set this out below.

Information you give us: If you complete a warranty form, we will process your personal information on the basis that it is in our legitimate interests as a business to administer the warranty.



## **WILL WE CHANGE THE WAY WE USE YOUR PERSONAL INFORMATION?**

We will only use your personal information for the purpose we have set out in this notice. We can only change the purpose we use it for without telling you where we need to use it for another reason and that reason is compatible with those set out in this notice or otherwise in accordance with data protection law. If we need to use your personal information for any other purpose, we will notify you and we will explain the legal basis which allows us to do so in a similar way to how we have done it in this notice.

## **DO WE USE YOUR PERSONAL INFORMATION TO MAKE AUTOMATED DECISIONS?**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision making (i.e. one without human intervention).

## **HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?**

We will not keep your personal information for longer than we need it for the purposes we have explained in this privacy notice. If a dispute arises between us, we will keep your personal information for the purposes of responding to and dealing with this dispute and this may mean that we keep your personal information for longer.

## **WHO WILL WE SHARE YOUR PERSONAL INFORMATION WITH?**

We will only share the personal information that you give us with the following third parties and for the following reasons:

- Group companies: We will share your personal information within our group companies which are all wholly owned subsidiaries of Gripple Limited. For details of our subsidiaries see [Companies House](#). We will only share your personal details to meet our contractual and legal obligations, promote the sale of our products and services and manage our supply chain. An example of this is where you are not based in the UK and enquire about one of our products, if one of our group companies is based in your country we will pass your personal information to them to enable them to assist with your enquiry. We consider the use of your personal information in this way is in our legitimate interests. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this is proportionate because we will only pass on the information you have given to us and we require our group companies to observe your rights in relation to data protection;
- Distributors: We may share your personal information with our distributors. We will only share your personal details with one of our distributors where we are unable to assist you. An example of this is where you enquire about one of our products and are based outside of the UK, if one of our distributors is based in your country we will pass your personal information to them to enable them to assist with your enquiry. We consider the use of your personal information in this way is in our legitimate interests. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this is proportionate because we will only pass on the information you have given to us and we require our distributors to observe your rights in relation to data protection;
- Credit card processors: If you choose to pay by credit card we will share your personal information with our credit card processors such as your first and last name, business name, e-mail and bank account number and sort code in order to process the payment. We do not store your financial information. We consider it is in our legitimate interests to be able to use credit card processors to process payments on our behalf. We have considered our legitimate

interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this is a proportionate use of your personal information because we only share the information that is necessary to enable our credit card processors to provide their services and they observe your rights in relation to data protection.

- Dot Digital: We may share your personal information with Dot Digital who are a marketing automation platform. Dot Digital may access your personal information such as your e-mail address to the extent that they need to in order to provide their services. We consider it is in our legitimate interests to be able to use Dot Digital to assist with our e-mail marketing. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this is a proportionate use of your personal information because we only share the information that is necessary to enable our suppliers to provide their services and it observes your rights in relation to data protection
- With organisations for the purposes of carrying out credit reference agency checks: Where we carryout credit agency checks in relation to our customer organisations or prospective customers the results may reveal your personal information if you are an officer, director or owner in order to safeguard our finances and reputation. We share your personal information in these circumstances on the basis that it is in our legitimate interests as a business to ensure we are contracting with customers who can honour their contracts with us. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this use of personal information is proportionate because we will only pass the information to reputable organisations, we will only pass on the information you have given to us, and they observe your rights in relation to data protection;
- With organisations for the purposes of carry out legal due diligence: We may share your personal information with organisations and agencies in order to carry out anti-bribery, anti-corruption and anti-money laundering checks and to prevent fraud. We share your personal information in these circumstances on the basis that it is necessary for compliance with a legal obligation under EU or Member State Law such as The Bribery Act 2010, Canada's Anti-Money Laundering and Financing Regime, the Anti- Money Laundering and Counter-Terrorism Financing Act 2006 and other legislation that we are bound by virtue of our corporate structure e.g. the Foreign Corrupt Practices Act of 1977.
- With delivery companies if you have ordered products from us: We will share your personal information with delivery companies to the extent necessary to deliver any products ordered and to enable them to contact you in relation to the delivery. We share your personal information in these circumstances on the basis that it is in our legitimate interests as a business to be able to use a reputable third party to deliver products. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider this use is proportionate because it is within your reasonable expectations for us to be able to arrange for delivery of products your organisation has ordered, we will only pass on the necessary information to allow the carrier organisation to carry out the delivery and we require them to observe your rights in relation to data protection.
- With companies who provide or support for our IT systems (including our CRM system and systems relating to recording our customer orders and supply chain, event bookings and marketing and website: We use reputable third parties to provide us with our IT systems, and website and support for them, as well as to facilitate best practice visits to our client's sites. They may access your personal information to the extent that they need to in order to provide their services. We consider it is in our legitimate interests to be able to use reputable third party providers to provide these services. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We

consider that this is a proportionate use of your personal information because we only share the information that is necessary to enable our suppliers to provide their services and we require them to observe your rights in relation to data protection;

- With a company that we merge with or transfer our business assets to: In the event that we sell all or part of our business, or merge with another company, we may transfer personal information that we have collected as described in this notice, along with our other business assets, to the company that we are selling to or merging with. We do this on the basis of our legitimate interests in being able to merge or sell our business. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this is a proportionate use of your personal information because we would only share what was necessary in order to allow the other entity to consider entering into the transaction and we would enter into a contract with them which required them to observe your rights in relation to data protection;
- With entities, companies or individuals outside our group for legal reasons: We will share your personal information with entities, companies or individuals outside our group where this is necessary to: comply with any law, rule, regulation, legal procedure or governmental request that is applicable to us. The legal basis for this is that sharing your personal information in this way is necessary in order for us to comply with our legal obligations.
- With entities, companies or individuals outside our group to obtain advice: We also share your personal information with external professional advisors such as lawyers or accountants in order to take advice or enforce the terms of our agreements. The legal basis for this is that it is in our legitimate interests as a business to be able to obtain professional advice from our external advisors about issues that may arise within our business such as how to enforce our contracts with our vendors. We have considered our legitimate interests carefully and have balanced our legitimate interests against your rights under data protection law. We consider that this is a proportionate use of your personal information because it is in your reasonable expectations that we would need to share your personal information with our professional advisors, we would only share what was necessary in order to allow our advisors to advise us, enforce our contracts and for the purposes of legal proceedings and our advisors observe your rights in relation to data protection.

It is understood that such third parties listed above shall respect strict contractual conditions that oblige them to maintain the confidentiality of all information and use it only for purposes related to the supply of services to us. Whenever we hire other organizations to provide support services, they will be required to conform to our privacy standards and to allow us to audit them for compliance.

## **WILL WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE CANADA/QUEBEC?**

We will store your personal information in Canada, the United Kingdom or in countries within the European Economic Area ("EEA"). We will only transfer your personal information outside the EEA or Canada/Quebec as follows:

- We may share your data with our group companies who are based outside of the EEA or Canada/Quebec.
- We may share your data with our distributors who are based outside of the EEA or Canada/Quebec.
- We may share your data with IT service providers who process your data outside of the EEA or Canada/Quebec.

We only transfer your personal information where applicable outside the EEA or Canada/Quebec where we have a legal basis for doing so and where we require that your personal information is protected to the same standard as it would be protected in the EU or Canada/Quebec.

If you would like further details about our transfer of your personal information outside of Canada/Quebec or the EEA please contact our Data Protection Manager (see above for contact details).

## **HOW DO WE ENSURE THAT YOUR PERSONAL INFORMATION IS SECURE?**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We take all reasonable steps to protect the security and confidentiality of your personal information. We protect the personal information within our custody or control with appropriate organizational, technological and physical safeguards. We store personal information in electronic and physical files that are secure, and our security measures include secure on and off-site storage, restricted access to records and data processing equipment, password protocols, and encryption and security software. We conduct audits and monitor compliance with our privacy practices. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## **WHAT RIGHTS DO I HAVE OVER MY PERSONAL INFORMATION?**

You have the right to make a complaint at any time to the Office of the Privacy Commissioner of Canada ([info@privcome.gc.ca](mailto:info@privcome.gc.ca)) or the data protection regulator in your jurisdiction of residence. We would, however, appreciate the chance to deal with your concerns before you approach the regulator and so, if you are happy to do so, please contact our Data Protection Manager (see above for contact details) in the first instance and we will try to resolve your issues.

You also have a number of additional rights over your personal information, which are:

- the right to ask us what personal information we have about you and to have a copy of your personal information from us;
- the right to ask us to correct any errors in your personal information;
- the right to ask us to review and explain our legitimate interests to you;
- the right to ask us to delete your personal information where: (i) we don't need your personal information anymore; (ii) you withdraw your consent to our use of your personal information and we have no other legal basis to keep your personal information; (iii) you have asked us to review and explain our legitimate interests to you and we don't actually have a valid legitimate interest to do what we are doing; (iv) our use of your personal information is illegal; (v) we have to delete your personal information to comply with our legal obligations;
- the right to object to processing in certain circumstances as well as the right to data portability;
- the right to ask us to transfer your personal information in certain circumstances;
- the right to ask us to restrict the use that we are making of your personal information where: (i) you don't think the personal information we have about you is correct, so that we can check if it is correct; (ii) what we are doing with your personal information is illegal but you would rather

we stop using your personal information rather than delete it; (iii) we don't need your personal information anymore, but you need us to keep it so that you can exercise any legal rights; and (iv) you have asked us to review and explain our legitimate interests to you, so that we can check whether we actually have a valid legitimate interest to do what we are doing; and

- If you want to exercise the rights set out above please contact our Data Protection Manager (see above for contact details).

In some cases the rights above are not absolute, for example we may not be able to disclose information if it would reveal personal information of another person. We will notify you in writing if we are unable to provide you with information, the reasons and your rights if you have any concerns.

## **HOW WE'LL TELL YOU ABOUT CHANGES TO THIS PRIVACY NOTICE**

We keep our privacy notice under regular review and it may change from time to time. Any changes we make to our privacy notice in the future will be posted on our website [gripple.com](http://gripple.com) and will be reflected in the above Last Update date. We encourage you to review the privacy notice when you visit our website to stay informed of how we are using your personal data.

## **HOW YOU CAN CONTACT US**

If you have any questions about this privacy notice or about the ways we use your personal information, please contact our Data Protection Manager (see above for contact details).