

## Our Privacy Policy

At Smiths MRO, we take your privacy very seriously.

We aim to be clear on how we use your personal information and protect it.

This Privacy Policy explains:

- Smiths MRO principles and ethos
- Our products and services to you
- What information does Smiths MRO collect from you and its usage?
- How we share information
- Compliance with Laws and Law Enforcement Requests- Protection of Our Rights
- Consent for collecting and storing your information
- How do we use the information we collect?
- What steps do we take to protect your information?
- What if Smiths MRO changes this privacy policy?
- Your rights and choices about your data
- How can you review your information or contact us about your data?



## Principles and ethos

We only use your data to provide you with the best services possible. We store your data safely and transparently and never sell it on.

In detail:

- Personal data is processed fairly, lawfully, and transparently.
- We only collect personal data for specified, explicit and legitimate purposes. Personal data does not undergo further processing in a manner incompatible with these purposes.
- Personal data is adequate, relevant and limited to only what is necessary for processing purposes.
- Personal data is accurate and kept up to date. Inaccurate information is updated or deleted.
- We keep personal data in an identifiable format for no longer than necessary.
- Personal data is kept secure.
- We aim to design our systems and procedures to protect your privacy and data.

## Our products and services to you

We provide services through our website, customer portals and internal systems to enable us to deliver our products to you.

If you have questions or need assistance, please contact us at [privacy@smithsmro.com](mailto:privacy@smithsmro.com)

## What information does Smiths MRO collect from you and its usage?

### Internal systems:

We store and use data about you to enable us to provide you with products and services as contractually agreed between us. This information includes your name, email address and contact information that you have provided to us during our discussions. We use this data to provide the best service we can.

### Third-party services acting directly on our behalf:

We may act as a data controller to provide aspects of your data to third parties acting on our behalf to improve our services to you. Any third party is strictly vetted to ensure your data is processed using the same principles and ethos as Smiths MRO.

### Selling of data:

We never sell or provide free information about you to third parties. The data we have stored in our systems relating to you remain exclusively in our systems.

### Cookies:

We do not use cookies on our websites.

### Analytics:

Users of our websites will have data stored in logs, including IP address and device/browser types/pages viewed/locale/system parameters. We use this data to look for trends and patterns of users using our services. We do not attempt to contact you or identify you personally using this.

### Third Party Services:

We may obtain information, including third person information from third parties and combine it with other information about you to improve the services we offer you.

## How we share information?

We do not sell your personal information. Your personal data allows us to provide our services to you. There are circumstances when we may share your private data with third parties as set out below:

### With your express consent:

We will not share your personal information with companies or individuals not associated with Smiths MRO without your explicit consent.

### For your own use:

For example, emailing yourself documentation using our portals.

### Credit Card Processing:

We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use billing information except for the sole purpose of credit card processing on our behalf.

### Agents, Consultants and Related Third Parties:

We sometimes engage other companies to perform certain business-related functions on our behalf. Examples of such functions include mailing information, maintaining databases, maintaining websites, analytics, marketing, and processing payments. When we employ another company to perform the functionality of this nature, we only provide information to facilitate the specific function. Some of these partners, such as analytics providers, may collect information about your online activities over time and across different online platforms when you use our services.

## Compliance with Laws and Law Enforcement Requests - Protection of Our Rights:

We may disclose your information (including your personal information) to a third party if:

- We believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request.
- To protect the security or integrity of our products and services.
- To protect our customers' property, rights, safety, and the public from harm or illegal activities.
- To respond to an emergency which we believe, in good faith, requires us to disclose information to assist in preventing the death or serious bodily injury of any person.
- To investigate and defend ourselves against any third-party claims or allegations.

#### Business Transfers:

We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. We will notify you of such a change in ownership or transfer of assets by posting a notice on our website.

#### Aggregate or Non-identifying Data:

We may share aggregate or other non-personal information that does not directly identify you with third parties to improve our overall service experience.

## Consent for collecting and storing your information

We will get consent to collect your personal information when the information is not related to our contractual obligations with you.

- What data we are collecting and why.
- The basis under which we collect your data.
- A description of what your data will be used for.
- Any data processors that may use your data with us as the data controller.
- How long we will keep the personal data, or how we calculate this period.
- The existence of the right to be forgotten.
- Whether we intend to further process the data.
- Information on how to reach us with questions about data privacy.

Once we present information supporting your options, you can make an informed choice between two specific options. Positive explicit consent (often called opt-in), or withhold your consent (often called opt-out).

## How do we use the information we collect?

We use the information collected for a variety of purposes, including:

- Making our services work for you.
- Provide, operate, maintain, improve, personalise, and promote our services.
- Develop new products, services and features.
- Process and complete transactions and send you related information, including quotations, order acknowledgements, consignment documentation and invoicing.
- Communicate with you relating to transactions, customer service and support.
- Provide details about our services, technical information, administrative messages, advertising or marketing messages.
- Monitor and analyse trends, usage, and activities connected to our services.
- Investigate and prevent fraudulent transactions, unauthorised access to our services and other illegal activities.
- We may also use the information we collect for other purposes. We will notify you in subsequent versions of this privacy policy document.

## What steps do we take to protect your information?

The security of your personal information is fundamental to us. We use generally accepted security standards to protect the personal information submitted to us, both during transmission and once it is received. If you have any questions about the security of your personal information, please get in touch with us at [privacy@smithsmro.com](mailto:privacy@smithsmro.com).

## What if Smiths MRO changes this privacy policy?

We may change and update this privacy policy from time to time. We will indicate changes by revising the version and date at the top of the policy document. We may update our website to highlight these changes when appropriate.

## Your rights and choices about your data

Smiths MRO strives for full regulatory compliance with UK GDPR legislation.

For further information, please visit <https://www.legislation.gov.uk/uksi/2019/419/introduction/made>.

A partial list of the regulation includes:

- The right to present information in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.
- The right to have access to your data and the ability to correct inaccuracies and omissions.
- The right to be informed about your data, including what information is processed and the purpose under which it is processed.
- The right to object – if you ask, we will stop processing your data.
- The right of erasure, or right to be forgotten – If you ask, we will erase non-business related data we hold.

## How can you review your information or contact us about your information?

Please contact [privacy@smithsmro.com](mailto:privacy@smithsmro.com), and we will review your request and reply promptly.



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Smiths MRO is a division of  
Smiths Advanced Metals

