



Customer Privacy Notice

This Customer Privacy Notice governs the collection, disclosure and use of personal information and data relating to potential and existing customers of Rocol UK (A Division of ITW Limited). This Customer Privacy Notice provides you with details about the personal information we collect from you, how we use your personal information and your rights to control personal information we hold about you.

By your continued use of our services (including our websites, lubrication scheduling App, and other services) you confirm that you have read, understood and agree to this Customer Privacy Notice in its entirety. If you do not agree to this Customer Privacy Policy in its entirety, you must not use our products or services. Please check back for updates regularly, as we may amend this Customer Privacy Policy from time to time. If you have any questions or queries about the contents, or about how we collect, store and use your personal information please email us at data.protection@fluidseurope.com

Rocol UK (A Division of ITW Limited) is committed to safeguarding and respecting your personal and business confidential information and privacy and will only process personal information you provide to us in accordance with applicable data protection laws. We are registered with the Information Commissioner under the Data Protection Act 2018 with registration number Z5621568 and are compliant with European General Data Protection Regulation (GDPR).

The personal information we collect

The personal information that we may collect about you broadly falls into the following categories:

- Your Name;
- Company Name;
- Business landline or mobile telephone number;
- Company or business postal address;
- Company or business email address;
- As well as other non-sensitive personal information;
 - Your industry interests
 - Your job title or job role
 - Company business information
 - Competitor product information
 - Details of your onsite machinery

If you use our websites, we may also collect information about you or your computer when you browse to allow you to use the services available, and also collect anonymous information about you or your computer for analysis to support continual improvements to our products and



services, as explained further in our Website Notice and in our Cookie Notice, both available at <https://www.rocol.com/privacy-policy>.

How we use your personal information

We use the personal and business information that we collect to respond to your enquiries, for payment processing, for the provision of goods and services to you or to the company that you represent, and for providing continuing product care such as warrant and technical support. We also process your personal information where we are required to do so by law, and for the exercise or defence of legal claims.

From time to time, we may contact you for research purposes, or to tell you about our special offers and other services in accordance with your contact preferences. Where appropriate, we will obtain your consent to do so. If you no longer wish to receive communications from us, please follow the “unsubscribe” instructions provided in any of those communications.

If we intend on using your personal for any other purpose, we will let you know how we intend to use it when it is captured. We will only process your personal and business information for the specific purposes listed above or for any other purposes specifically permitted by law.

Our legal basis for processing your personal information

We will only process your personal information specified in this Privacy Notice where you have consented (which you may withdraw after giving it if we are relying on consent as a legal basis), in order to perform a contract with you, or where the processing is necessary for our legitimate interests or the legitimate interests of others, for example, for market research purposes or, where you are an existing customer or user, to promote our goods and services.

How long we retain your personal and business information

We will retain your personal information if it is required for a specific purpose. We have a statutory duty to keep certain records for a specified minimum period, for example personal information in relation to the purchase of a product or service from Rocol UK. We will not retain any data that is not connected to the purchase of Rocol UK products or services for longer than 5 years. We will also retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Information that is no longer required for any valid business purpose, and that we are not required to keep pursuant to any applicable law, will be routinely destroyed by secure means.

Who we share your personal information with

We may share your personal information with the following categories of recipients:



- our group companies, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website/application), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- A potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- Any other person with your consent to the disclosure.

We may transfer your personal information to our associated entities and other members of our group of companies (including our parent company, Illinois Tool Works Inc., in the US).

Please be aware that countries outside of the European Economic Area (EEA) may not offer the same level of data protection as a country within the EEA. We ensure that we have a relevant data processing agreement in place with each third party outside the EEA to ensure they are compliant with privacy and data protection laws. We will make sure that any transfer of your personal information by us will be secured and/or encrypted for its protection.

How we protect your information

We store your personal data in secure data centres in European Union. We take reasonable and appropriate administrative, technical, and organisational steps to protect your personal data from loss, theft and unauthorised uses, access, disclosure, modifications or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

The secure server encrypts all sensitive information you input before it is sent to us. We use both technical and procedural methods to maintain the integrity and security of our databases, including but not limited to encryption for data transfer, firewalls, restricted access to data, employee training, and other methods.



Choices you have about how we use your information

You have the following rights under data protection laws:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

Please note that the GDPR sets out exceptions to these rights. These rights may not apply in some cases, including where we must comply with legal requirements, where it would violate the rights of someone other than the individual requesting access, or (in the case of your right to request access to your personal information) where the request is manifestly unfounded or excessive. If we are unable to comply with your request due to an exception we will explain this to you in our response.

If you would like to request access to, correction, amendment, or deletion of your personal information, please contact us using one of the methods below. We may request specific information from you to confirm your identity. In certain circumstances, for instance if you request substantial copies of documents, we may charge a reasonable fee.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.



Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

How to contact us

Complaints: We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to data.protection@fluidseurope.com. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with your local data protection authority. For further information on your rights and how to complain to the data protection authority, please refer to your local data protection authority website.