

# Privacy Policy

## FP (Tools) Limited trading as FP Group (“FP”) – Global Privacy Policy 2018 Rev 1.0

FP respects your right to privacy. This policy summarizes what personal information we may collect, how we may use this information, and other important topics relating to your privacy and data protection.

It is FP policy to comply with all applicable privacy and data protection laws. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners and others who would share their personal information with us.

This Policy applies to all Internet sites and mobile applications operated by or on behalf of FP. It also applies to personal information FP may otherwise collect:

- through our products and services
- when you interact with us by means other than an FP Internet Site or App, for example, in person, by telephone, or at a trade show or training
- from our customers, suppliers, vendors, and other business partners

However, different FP Internet Sites, Apps, products, and services have different purposes and features. If additional or different disclosures are required for a specific FP Internet Site, App, product, or service, then we provide those disclosures separately on, or with, the relevant Internet Site, App, product, or service. Each such specific privacy disclosure, policy, or statement (“Specific Privacy Statement”) supplements and amends this Policy.

### General Principles of Collection, Use and Disclosure of Personal Information

To the extent required by applicable law, whenever FP collects personal information, FP will:

- provide timely and appropriate notice to you about our data practices
- collect your personal information only for specified and legitimate purposes. The information we collect will be relevant, adequate and not excessive for the purposes for which it is collected
- process your personal information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented
- take commercially reasonable steps to ensure that your personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date
- not use your personal information for direct marketing purposes without giving you an opportunity to “opt-out”
- take appropriate measures, by contract or otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country, including transfers within FP.

### Personal Information FP Collects

FP collects the following types of personal information:

#### Information You Provide

FP collects personal information you provide us, which may include:

- contact information, such as your name, company name, job title, address, e-mail address, and phone number
- additional information about you to help us get to know you better, such as your gender, age, date of birth, nationality, professional associations and registration numbers, information about how you use our products, and demographic information
- comments, questions, requests and orders you may make

- financial information needed to process payments if you make purchases, such as credit card or account information or tax identification number
- log-in information, including, if applicable, social media account information for login purposes
- information about your preferences, such as your preferred methods of communication and product types in which you are interested

#### Information Automatically Gathered from Your Device

FP may collect technical information about your device, such as device type, browser type, IP address, operating system, and device identifier. FP collects this information automatically from your device and web browser through cookies and similar technologies.

Information about how you interact with us. FP may collect technical data about your usage of FP Internet Sites and Apps and how you interact with our digital advertisements and promotions, such as content viewed or downloaded, features used, links clicked, FP promotional emails opened, and dates and times of interactions. FP collects this information using **cookies\*** and similar technologies.

Location information. FP may collect location information, including precise real-time location information from your device and imprecise location information derived from, for example, your IP address or postal code. FP Apps will NOT access precise-real time location information from your device unless you grant permission to do so.

#### **\*Cookies and Similar Technologies:**

A "cookie" is a file of information placed on your device when you visit a website. Cookies and similar technologies can enhance your user experience by saving your preferences, personalizing your online experience, holding items in your shopping cart, and sometimes providing you with advertising which is tailored to your interests.

#### **More Information**

FP Internet Sites use "session cookies." A session cookie does not identify you personally and expires after you close your browser. For example, when you use the FP Product Catalogue FPOnline, we place a session cookie to note what pages you have viewed. We can use this information to provide you recommendations of other products that may be of interest.

FP Internet Sites also use "persistent cookies." These cookies do not expire when you close your browser. Persistent cookies stay on your computer until you delete them or they expire. By assigning your computer a unique identifier, we are able to create a database of your previous choices and preferences which can be provided by us automatically, saving you time and effort on future visits. For example, after you make a purchase, if you decide to make another purchase, your shipping address may have been retained and will only need to be confirmed.

Certain countries require your consent to the use of cookies when you visit FP Internet Sites. If you access a FP Internet Site for one of these countries, you will be presented with information regarding your options, including the option to accept or reject certain categories of cookies. You will be able to change these settings on subsequent visits. Please note that you will not be able to opt out of receiving certain cookies that are strictly necessary for the delivery of a service requested by you. At any time when visiting a FP Internet Site for one of these countries, clicking on the "Cookie Preferences" link at the bottom of each page allows you to access information on cookies and change your settings.

Although you are not required to accept cookies when you visit a FP Internet Site, you may be unable to use all of the functionality of the site if you reject certain cookies.

In addition, your browser may allow you to adjust settings to accept or reject cookies, or to alert you when a cookie is placed on your computer.

Analytics and Advertising. FP uses third-party analytics services to better understand how users engage with FP Internet Sites and Apps, including services provided by Google. Please use the following links for more information about how Google and Adobe collect and use data when you visit their partners' websites or apps:

- [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

### **Do Not Track Browser Settings**

Some browsers may transmit "Do Not Track" ("DNT") signals to the websites you visit. Because there is not common agreement about how to interpret DNT signals, FP currently does not take action in response to them.

### **How FP Uses Your Personal Information**

FP may use your personal information to:

Develop and manage our relationships with you and our Business Partners. This may include:

- delivering services or carrying out transactions that you or our Business Partners have requested
- providing information about FP products, services, and transactions, and advertisements, that may be of interest to you
- providing you and our Business Partners a more consistent experience in interacting with FP, including by learning more about you and how you use and interact with FP Internet Sites, Apps, products, and services
- planning, managing, and performing under our contractual relationships with our Business Partners

Communicate with you or your company. This may include:

- informing you of FP products, services, and promotional activities that may be of interest to you or your company
- providing information about relevant FP products, services, and transactions, including, for example, pricing information, technical data, invoice, shipping, or production information, warranty or recall information, or information about product or service improvements
- responding to questions or inquiries that you make, including customer service requests
- inviting you to participate in, or informing you of the results of, customer satisfaction or market research surveys

Provide and improve our Internet Sites, Apps, products, and services. This may include:

- customizing them to your preferences or interests, making them more compatible with your technology, or otherwise making them easier to use
- maintaining the security of and otherwise protecting them
- developing new FP Internet Sites, Apps, products and services

Address legal issues. This may include:

- complying with our obligations to retain certain business records for minimum retention periods
- establishing, exercising, or defending legal claims
- complying with laws, regulations, court orders, or other legal process
- detecting, preventing, and responding to fraud, intellectual property infringement, violation of our contracts or agreements, violations of law, or other misuse of FP Internet Sites, Apps, products or services
- protecting FP's rights or property, or yours or others' health, safety, welfare, rights, or property

FP may also use your personal information for other uses consistent with the context in which the information was collected or with your consent.

FP may anonymize or aggregate any of the information we collect and use it for any purpose, including for research and product-development purposes. Such information will not identify you individually.

### **When FP May Share Your Personal Information**

FP will not disclose your personal information except as described here:

FP may share your personal information with other FP entities, including those in different countries. When we do so, these other FP entities will use your information in a manner consistent with this Policy, any applicable Specific Privacy Statements, and all applicable privacy and data protection laws.

FP may also share your personal information with third parties we hire to perform support services for us. These third parties are required to use the personal information we share with them only to perform services on our behalf and to treat your personal information in compliance with all applicable privacy and data protection laws.

In some cases, FP may share your personal information with third parties who partner with us to provide products and services to our customers, such as distributors. If so, we will require our Business Partners to use that information in a manner consistent with this Policy, any applicable Specific Privacy Statements, and all applicable privacy and data protection laws.

FP may share your personal information with third parties when we have a good faith belief that disclosure is necessary:

- to comply with a law, regulation, court order, or other legal process
- to detect, prevent, and respond to fraud, intellectual property infringement, violation of our contracts or agreements, violation of law, or other misuse of FP Internet Sites, Apps, products or services
- to protect FP rights or property or yours or others' health, safety, welfare, rights, or property
- under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information

FP may share your personal information with third parties in connection with the sale, purchase, merger, reorganization, liquidation or dissolution of FP or a FP business unit, or under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.

FP may share your information with your permission or at your request.

FP may share anonymized or aggregated information internally and with third parties for any purpose. Such information will not identify you individually.

### **Security of Your Personal Information**

Your personal information will generally be stored in FP databases or databases maintained by our service providers. Many of these databases are stored on servers located in Europe. FP takes appropriate measures, by contract or otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country, including transfers within FP.

FP maintains reasonable safeguards to protect the confidentiality, security and integrity of your personal information. Although we use security measures to help protect your personal information against unauthorized disclosure, misuse, or alteration, as is the case with all computer networks linked to the Internet, we cannot guarantee the security of information provided over the Internet and will not be responsible for breaches of security beyond our reasonable control.

### ***Links to Third Party Internet Sites and Plugins***

FP Internet Sites and Apps may contain links to websites or mobile apps that are not operated by FP and plugins from social media platforms and other third parties. An example of a social media plugin is the Facebook “Like” button. We provide these links and plugins as a service and do not imply any endorsement of the activities or content of the related websites, apps, or social media platforms, nor any association with their operators. To learn about the information collected by these third-party websites, apps, and plugins, please visit their privacy policies. We encourage you to review the privacy policies for the websites, apps, and social media platforms you visit before using them or providing personal information.

### ***Access to Your Personal Information***

You may request a copy of all personal information held in regard to you at [dpo@fptools.co.uk](mailto:dpo@fptools.co.uk). Further security measures may be required to prove your identity prior to release of information.

### ***Retention of Your Personal Information***

How long we keep your personal information will vary and will depend on the purpose and use of information collected. There are legal requirements that we keep some types of data for specific periods. Otherwise, we will retain it for no longer than is necessary for the purposes for which the data was collected.

### ***Children***

Most FP Internet Sites and Apps are not intended for children under 13 years of age. FP will not knowingly solicit or collect personal information from or about children under 13, or the relevant minimum age under applicable local legal requirements, except as permitted under applicable law.

### ***Additional Information for EU Residents***

#### ***Data controller and contact information***

The controller for personal data collected under this Privacy Policy is the relevant FP entity in your country, and, as applicable, FP (Tools) Limited, Warwick House, Tyseley Lane, Tyseley, Birmingham, B11 3PX..

FP’s lawful basis for processing your personal data

The lawful basis for FP’s processing of your personal data will depend on the purposes of the processing. For most personal data processing activities covered by this Privacy Policy, the lawful basis is that the processing is necessary for FP’s legitimate business interests. Where we process personal data in relation to a contract, or a potential contract, with you, the lawful basis is that the processing is necessary for the performance of our contract with you or to take steps at your request prior to entering into a contract. When we are required to share personal data with law enforcement agencies or other governmental bodies, we do so on the basis that we are under a legal obligation to do so. We will also use consent as the legal basis where we deem appropriate or to the extent required by applicable law, for example, before we collect precise location data from your mobile device.

#### ***More Information***

Processing on the basis of legitimate business interests. When we process personal information on the basis that the processing is necessary for our legitimate business interests, such interests include:

- providing, improving, and promoting FP Internet Sites, Apps, products, and services
- communicating with current and potential customers, other Business Partners, and their individual points of contact

- managing our relationships with our customers and other Business Partners, and their individual points of contact
- other business development purposes
- sharing information within the FP group, as well as with service providers and other third parties
- maintaining the safety and security of our products, services and employees, including fraud protection

### ***Processing based on performance of a contract***

Examples of situations in which we process personal information as necessary for performance of a contract include e-commerce transactions in which you purchase a product or service from FP, on your own behalf, through a FP Internet Site or App.

### ***Processing based on consent***

Examples of processing activities for which FP uses consent as its legal basis include:

- collecting and processing precise location information from your mobile device
- sending promotional emails when consent is required under applicable law
- processing personal data on FP Internet Sites or Apps through cookies and similar technologies when consent is required by applicable law

### ***Processing because FP is under a legal obligation to do so***

Examples of situations in which FP must process personal data to comply with its legal obligations include:

- payment of taxes and other government levies
- providing your personal data to law enforcement agencies and other governmental bodies when required by applicable laws
- retaining business records required to be retained by applicable laws
- complying with court orders or other legal process

### ***Additional information about the retention of your personal data***

To determine the period for which your personal data will be retained in accordance with this Policy, FP considers criteria such as:

- any applicable legal requirements to retain data for a certain period of time
- any retention obligations related to actual or potential litigation or government investigations
- any retention requirements in relevant agreements with our Business Partners
- the date of your last interaction with FP (including with FP Internet Sites, Apps, communications, etc.)
- the length of time between your interactions with FP
- the sensitivity of the data
- the purposes for which the data was collected

### ***Your individual rights***

In accordance with the applicable laws in the European Union, you have the following rights with respect to your personal data, which apply differently in different circumstances: right of access, right to rectification, right to erasure, right to restriction of processing, right to data portability and right to object to processing. Most of these rights are not absolute. Below we describe these rights in more detail and provide information on how you can exercise them. If you make a request to exercise your rights, we will respond within one month, but have the right to extend this period by two additional months, where necessary. If we extend the response period, we will let you know within one month from your request. You can exercise your rights by contacting us at [dpo@fptools.co.uk](mailto:dpo@fptools.co.uk).

## **More Information**

### **Right of Access**

You have the right to ask FP to confirm whether we process your personal data. If we do, you have the right to request access to your personal data that we process and the following information:

- the purposes of the processing
- the categories of personal data we process
- the recipients or categories of recipients of your personal data
- the envisaged retention period of the data where possible, or the criteria we use to determine the retention period
- your right to request rectification or erasure of your personal data, or restriction of the processing of such data
- your right to file a complaint with a supervisory authority
- if we have not collected the data from you, any information we have available about the source of the data
- whether we use your personal data to make any automated decisions that have legal or other similar significant effects on you

### **Right to Rectification**

You have the right to have FP correct your personal data if they are inaccurate. Taking into account the purposes of the processing, you may also have the right to have incomplete personal data about you completed, including by providing a supplementary statement to FP.

### **Right to object to processing for FP's legitimate business interests**

You have the right to object to FP processing your personal data when that data is processed on the basis of FP's legitimate business interests. FP will honour your objection and stop processing the relevant personal data unless:

- we have compelling legitimate grounds for the processing that override your interests, rights, and freedoms
- we need to continue processing your personal data to establish, exercise, or defend a legal claim

### **Right to object to processing for direct marketing**

If FP processes your personal data for direct marketing purposes, you have the right to object to this processing. If you exercise this right, FP will stop processing your personal data for direct marketing purposes.

### **Right to restrict processing**

You have the right to request that FP restrict the processing of your personal data in the following circumstances:

- for the period of time FP needs to verify the accuracy of your personal data when you contest its accuracy
- when the processing of your personal data is unlawful and you oppose the erasure of the data, and instead request that FP restrict the use of the data
- when FP no longer needs your personal data for the purposes of processing, but you need the data to establish, exercise, or defend a legal claim
- for the period of time FP needs to verify if it has compelling legitimate grounds for processing that override your interests, rights, and freedoms when you object to the processing of your personal data for FP's legitimate business interests

If following your request FP restricts the processing of your personal data, FP will store your data, and otherwise process it only with:

- your consent
- to establish, exercise, or defend a legal claim

- to protect the rights of another natural or legal person
- for reasons of important public interest of the European Union or a Member State. FP will also inform you before lifting the restriction of processing.

### **Right to Erasure**

The right to erasure is also called the “right to be forgotten.” You may ask FP to delete your personal data. This right is not absolute. FP is required to delete your personal data upon your request only in the following circumstances:

- your personal data is no longer necessary for the purposes for which FP collected or processed them
- if FP processes your personal data on the basis of consent, you withdraw your consent, and no other legal ground exists for FP to continue processing your personal data
- if FP processes your personal data for its legitimate business interests, you object to the processing, and there are no overriding legitimate grounds for FP to continue processing your personal data
- if FP has processed your personal data unlawfully
- the personal data must be erased to comply with a legal obligation under European Union or Member State law to which FP is subject

FP is not required to erase your personal data to the extent that FP needs to process them to:

- exercise its right of freedom of expression and information
- comply with a legal obligation under European Union or Member State law to which FP is subject
- to establish, exercise, or defend a legal claim

### **Right to Data Portability**

You have the right to receive personal data you provided to FP when:

- the processing of the data is based on your consent or is necessary for the performance of a contract between you and FP
- FP’s processing of your personal data is carried out by automated means
- complying with your request will not adversely affect the rights and freedoms of others

If you have the right to receive such personal data and request that FP provide it, FP will provide it to you in a structured, commonly used, and machine-readable format.

### **Right to Lodge a Complaint with a Supervisory Authority**

FP will use its best efforts to address and settle any requests or complaints brought to its attention. If for whatever reason, you feel we have not met the high standards we expect of ourselves, you have the right to approach the competent data protection authority with requests or complaints. This can be the supervisory authority in the country or federal state where you live. The overall competent supervisory authority for FP in the UK is:

Information Commissioners Office (ICO.)

The ICO is the UK’s independent data protection authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Telephone: 0303 123 1113

Website: <https://ico.org.uk>

Your concerns can be reported here:

<https://ico.org.uk/concerns/>

### **Questions about this Policy or our Privacy Statements**

If you have any questions about this Policy or a Specific Privacy Statement or our use of your personal information, please contact FP's data protection officer at:

Attn. Data Protection Officer  
FP (Tools) Limited  
Warwick House  
Tyseley  
Birmingham  
B11 3PX  
United Kingdom  
E-mail: [dpo@fptools.co.uk](mailto:dpo@fptools.co.uk)

### **Changes to this Policy and our Privacy Statements**

Changes to this Privacy Policy will be posted on this site, along with information on any material changes. FP reserves the right to update or modify this Policy and any Specific Privacy Statements at any time and without prior notice. Any modifications will apply only to the personal information we collect after the posting.

This Policy was last revised in May 2018.