

## PRIVACY POLICY

This Privacy Policy describes how we process personal data when using our website at [www.satoeurope.com/uk/](http://www.satoeurope.com/uk/).

### 1. What is personal data?

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Personal data is any type of information that relates to an identified or identifiable natural person. This can be data that is personal to you, such as your name, address, email addresses and behaviour as a user.

### 2. Data Controller and Data Protection Officer

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Pursuant to Art. 4 (7) General Data Protection Regulation (GDPR), the Data Controller is available at SATO UK Limited, Valley Road, Harwich, Essex CO12 4RR, United Kingdom. [enquiries-uk@sato-global.com](mailto:enquiries-uk@sato-global.com).

We have also appointed a Data Protection Officer. You can reach our Data Protection Officer under [gdpr-eu@sato-global.com](mailto:gdpr-eu@sato-global.com).

### 3. What data do we collect?

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Our website is intended primarily for informational use. Interested users can use it to find out about our company and our products and services. The data and information we collect can be divided into the following categories:

Automatically collected data: When you access and use our website, we automatically collect information, including personal information on the technology you use, and information on how you use it and our website.

- x Log files and device information : Log files contain data that your browser automatically sends to our web server. These log files contain information about:
  - x Your IP address
  - x Date and time of access
  - x The URL requested (specific page)
  - x Access status/HTTP status code
  - x The volume of data transferred in each case
  - x The website from where the request came (referring URL)
  - x The browser type and browser language setting
  
- x Cookies/Beacons: We use cookies and web beacons and also allow our business associates and partners to use these tracking technologies on our website. Cookies are tiny snippets of information your browser automatically stores in the main memory on your computer. Cookies contain different data, such as information on the pages viewed, the frequency of page views and actions you have taken on our website (such as you sharing our website with one of your social networks). Technical precautions are undertaken to pseudonymise this data thus making assignment of the data to a specific user impossible. Please refer to our Cookie Policy for more information on which cookies we use and how we use these technologies.

Web beacons are small, invisible graphics that are loaded by a server as soon as you visit one of our websites. This process is registered along with the visitor's IP address and allows your movements to be tracked on our website.

Data and information you provide : If you contact us with general questions about our company or our products or write to us about technical problems you are having with our products, we store and process the personal data you submit with your enquiry/request. To contact us, please select one of the communication methods listed under "Contact". The "Contact" page also features a contact form for your use where we ask you to provide the information marked with an asterisk (\*). The information and data you provide us with beyond that is made at your discretion. We may also establish contact with you and ask you for additional data and information.

#### 4. How do we use the data you collect? On which legal basis is the data used?

We use, store and process information, including personal data on your person, for the following purposes and on the following legal basis:

Provision, improvement, enhancement and security of our website: We use the log files that are automatically collected on your device in order to be able to provide you with the website and its functions in the first place. We also use this information and data to optimise our website and safeguard the security of our IT systems. Your IP address needs to be stored for the duration of the session for this purpose.

We use log files as part of our legitimate interest in ensuring the availability and enhancement of our website. The legal basis for the use of the log files is formed by Art. 6 (1) (f) GDPR.

Analysis : We use the information and data we generate through cookies to analyse how our website is used. As a result, we learn more about the number of visits to a page, user behaviour and the length of the visit, so that we can draw conclusions about which content on our website is of particular interest to visitors and which is less interesting. We may take this into account when making updates or redesigning our website in future.

We have a legitimate interest in analysing how our website is used. This is the only way we can find out whether and how our website attracts any interest at all. This allows us to better plan and use our resources. The legal basis for the use of cookies for analytical purposes is formed by Art. 6 (1) (f) GDPR.

Marketing and advertising : We also use the data from cookies and web beacons for advertising purposes, for instance, to display advertising on our website or on third-party websites. This data can provide information on your movements on the Internet and which advertising you were particularly interested in because you clicked on it. This allows our advertisers to use their advertising in a much more targeted fashion and make recommendations based on your interests and preferences.

We have a legitimate interest in using your information as part of our marketing and promotional activities, because we wish to offer you our products, or offer you those products that may be of interest to you. Furthermore, we can use the data obtained through the cookies to understand how efficient our advertising campaigns are, which helps us plan and budget our advertising. The legal basis for the use of cookies for analytical purposes is formed by Art. 6 (1) (f) GDPR.

Communication : We use the information that we ask you for or that you provide us with, in connection with your enquiry when you contact us, to respond to your enquiry as quickly as possible and in the most fitting manner.

The use of your data within the context of communicating with you corresponds to our legitimate interest in accordance with Art. 6 (1) (f) DSGVO. Insofar as it concerns a specific enquiry about our products, your data is used to execute a contract or execute pre-contractual measures at your request in accordance with Art. 6 (1) (b) GDPR.

#### 5. Do you share my personal data and information with others?

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We work with various service providers to provide our website and for the purposes outlined above. This involves the following products that we have embedded into our website and about which we inform you now based on our current knowledge:

- x Google products : We embed products from Google, LLC, 1600 Amphitheatre Pkwy, Mountain View, CA 94043, USA into our website. Google collects and stores data using cookies which are automatically stored on your computer (for more information on cookies, see above). The Google products we use are:
  - o Google Analytics: We use the analytics service, Google Analytics, provided by Google for the aforementioned analytical purposes. Google Analytics is comprised of an analysis tool that provides us with information about how our website is used. We or Google use cookies on your computer for this purpose that record your behaviour on our website and transmit it to Google. Google uses this information to compile reports on how our website is used. Google may also transfer this information to third parties if required to do so by law, or where such third parties process the information on the behalf of Google.

We have enabled IP anonymisation for Google Analytics. Google truncates your IP address in the Member States of the European Union or other states that participate in the EEA before sending it to the Google servers in the United States. This makes it untraceable. Only in exceptional cases is the complete IP address transferred to a Google server in the US and truncated there.

For further information on Google Analytics please go to: <http://www.google.com/intl/en/analytics/learn/privacy.html>.

- o Google AdWords conversion : Like most manufacturing companies, we use online advertising to try to promote our company and our products and to increase the amount of attention we receive from potential customers. Advertising thus comprises a high proportion of our costs. In order to minimise these costs and make our advertising more efficient, we are extremely interested in finding out how successful our advertising campaigns are, and, in particular, whether the advertisements we have placed have led you to us, and if so, by which route.

The Google AdWords conversion tool helps us do exactly that. If you are forwarded to our website by a Google ad that appeared in a Google search, Google AdWords places a cookie on your computer. These cookies include the unique cookie ID, the number of ad

impressions per placement (frequency), the last impression (relevant to post-view conversions) and the opt-out information (a flag showing that the user no longer wishes to be addressed). Google uses this data to prepare a statistical analysis, which we then analyse accordingly. We do not collect and process personally identifiable information in connection with the AdWords cookie and do not receive any further data.

We have no control over the scope and further use of the data collected by Google through the use of this tool. Google may collect and process your IP address and, if you are registered with a Google service, may associate your visit to our website with your account.

For more information on how conversion tracking works, please refer to: <https://support.google.com/adwords/answer/1722022?hl=de>

- o Google Remarketing . This application allows us to redirect you to other websites as soon as you leave our website. This is performed by means of cookies stored in your browser, which record your usage behaviour when visiting various websites and is evaluated by Google. This is how Google determines that you previously visited our website. According to Google, the data collected during remarketing and your personal data, which Google may store, is not combined. According to Google, pseudonymisation is used specifically in remarketing.

For more information about Google Remarketing, please refer to: <https://support.google.com/adwords/answer/2453998?hl=en>.

x Hotjar

To analyse our website, we use the analysis tool from Hotjar Ltd., Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta. Hotjar randomly selects individual visitors to our website and records their interactions (i.e. mouse movements and clicks on our website) in anonymous form. This allows us to track which content on our website has attracted the interest of the user and which has not. Hotjar also collects technical information on the operating system used, browser, incoming and outgoing links, geographical origin, and the resolution and type of the device used by the visitor. This information is analysed for statistical purposes. We also offer an option for anonymous user feedback through Hotjar over what are referred to as "feedback pools".

The information collected is not of a personal nature and is stored by Hotjar Ltd. and not passed on to other third parties. For additional information about the functions and data usage that takes place through Hotjar, please refer to: <https://www.hotjar.com/privacy>.

x Sales Manago

We use the marketing tool SALESmanago of Benhauer sp. z o.o., 21 Grzegórzecka St, 31-532 Krakow, Poland. This is a so-called Marketing Automation Service, which supports us in the design and implementation of marketing measures. For this purpose, SALESmanago uses cookies with which your user behaviour can be analysed so that we can align our marketing measures, in particular our e-mailings, more demand- and target-oriented. SALESmanago is used as a web-based solution (SaaS).

The use of a SALESmanago is to streamline sales and marketing departments by replacing high-touch, repetitive manual processes with automated solutions. SALESmanago is a platform that marketers use to plan, coordinate, manage and measure all of their marketing campaigns, both

online and offline (email marketing, social media, SMS, ad networks, website channel).

Marketing Automation is a subset of customer relationship management (CRM) that focuses on the definition, segmentation, scheduling and tracking of marketing campaigns. Marketing Automation can be defined as a process where technology is used to automate several repetitive tasks that are undertaken on a regular basis in a marketing campaign. The system allows an individual to design, execute and automate a time-bound marketing workflow.

The system will also allow users to perform new obligations such as realizing the user's right to be forgotten and encrypting the customer's personal information. Further information can be found in the service provider's privacy policy: <https://www.salesmanago.com/info/gdpr.htm>.

#### 6. How long do you save my data for?

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We only retain the information you have provided us with for as long as it is necessary to fulfil the purpose for which you provided us with your data, or for compliance with legal regulations.

Log files that we use for the purpose of providing our website are automatically deleted as soon as the session ends. Log files for security purposes and as a precaution against attacks on our websites are automatically deleted after 7 days at the latest. The storage period for cookies varies according to the type of the cookie set and your browser settings.

#### 7. Is data also transmitted to recipients outside the European Union or the European Economic Area (EEA)?

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We share personal data with data processing companies based in non-EEA countries. In this case, before forwarding it, we ensure that the recipient either provides an adequate level of data protection (e.g. based on an EU Commission adequacy resolution for that particular country, self-certification by the recipient under the EU-US Privacy Shield or by agreeing what are referred to as EU standard contractual clauses for the European Union with the recipient) or adequate consent.

You can obtain an overview of the recipients in third countries and a copy of the specific arrangements agreed to ensure the appropriate level of data protection. Please use the details provided on the Contact page for this purpose.

#### 8. Which rights do I have?

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Pursuant to the General Data Protection Regulation, you have the right to information on your data, as well as its rectification, deletion and portability.

If our legitimate interests justify data processing, you are entitled to object to data processing for the future, unless the data is absolutely necessary for operating the website (in particular for log files).

Your right to object to Google products: You can prevent Google from storing cookies in various ways:

- x By setting your browser to reject cookies. Suppressing third-party cookies specifically results in you not receiving third-party ads. However, we would like to point out that this may limit your ability to use all of the features on our website to the full.
- x For "Google Analytics", you can download and install the browser add-on that Google offers using the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.
- x To prevent Google exploiting their interest in displaying user or interest-based advertising you can download and install the browser add-on provided by Google under the following link: <http://www.google.com/settings/ads/plugin>.
- x By disabling interest-based ads from providers that are part of the About Ads self-regulatory campaign under the link <http://www.aboutads.info/choices>, whereby this setting will be deleted when you delete your cookies.

You are entitled to object to Hotjar: You can prevent tracking by Hotjar by enabling (opt-out) a "do not track" header in your browser: <https://www.hotjar.com/opt-out>

Your right to appeal to a supervisory authority : Without prejudice to the rights set out above, you are entitled to complain to a supervisory authority, in particular in the member state where your place of residence or employment is located or where the alleged infringement took place, if you believe that processing your personal data violates the GDPR.

The supervisory authority to which the complaint is submitted will inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

## 9. Contact

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Both we and our Data Protection Officer will be glad to help if you require any information and suggestions on data protection. Please contact [gdpr-eu@sato-global.com](mailto:gdpr-eu@sato-global.com) in relation.

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