

INEOS HYGIENICS PRIVACY POLICY - WEBSITE



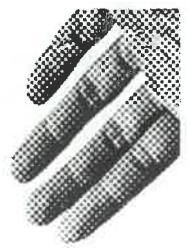
Document and Version #: INEOS-H-GDPR-002c-001

Last Revision Date: February 2023

Originator: Sophie Williams

Approver: Rory Tait (Hygienics COO)

APPROVED
BY: DH DATE: 16/5/23



Purpose/Scope

This Privacy Policy contains 11 sections. You can click on each section to see a summary and access further details by clicking "Find out more".

1. Introduction

Welcome to the INEOS Hygienics website. This policy explains how we handle and use your personal information and your rights in relation to that information. Under data protection law, INEOS Hygienics Limited is the controller of that information.

Find out more.

INEOS Hygienics Limited (**we, our or us**) is committed to protecting and respecting your privacy. This Privacy Policy explains why and how we will use the personal information that we have obtained from you or others, with whom we share it and the rights you have in connection with the information we use. Please read the following carefully.

This policy describes the way we handle and use the personal information that we obtain from all the different interactions you may have with us as a business, including when you visit our social media pages or website currently located at www.ineoshygienics.com, including dispenser.ineoshygienics.com (**Site**) or when you contact us or take part in any of our competitions or promotions.

INEOS Hygienics Limited is the controller in relation to the processing activities described below. This means that INEOS Hygienics Limited decides why and how your personal information is processed. Please see the section at the end of this policy for our contact and legal information. This policy was last updated on the date that appears at the top of this page.

2. Personal information we collect about you

We receive personal information about you that you give to us, that we collect from your visits to our Site and social media pages and that we obtain from other sources. We only collect personal information which we need and that is relevant for the purposes for which we intend to use it.

Personal information that you give to us

We collect the following information if you choose to give it to us when you visit our Site or social media pages or when exercising your legal rights:

- your name, title, job title and contact details (email address, telephone number, postal address, social media handle);
- the login credentials to your account on the Site;
- any information you include in correspondence you send to us or in forms you submit to us when using our Site or social media pages;
- details of your orders;
- your marketing preferences;
- the opinions and other information you provide when responding to customer surveys;
- any personal information included in your entries to competitions that we run;
- your identification information when exercising the rights that you have in relation to our processing of your personal information (see further [Your rights in relation to your personal information](#));
- your payment card and, in relation to certain refunds, your bank account details.

Information that we collect about you

When you visit our Site we automatically collect:

- the frequency of your voucher downloads;



- the internet protocol (IP) address of your device and details regarding the type of device and browser software you use to access the Site;
 - details of your use of our Site, namely traffic data, weblogs and statistical data, including where and when you clicked on certain parts of our Site and details of the webpage from which you visited it;
 - details regarding when and how you consented to receive marketing communications from us (including the time and date you provided your consent); and
 - cookie, pixels and beacon identification information (for more information please see our [Cookie Policy](#)).
-

When you visit our social media pages we collect:

- the information you post on those pages;
 - information regarding your interactions with the content we post; and
 - statistical information regarding all our followers' activities (but from which we cannot identify you as we only have access to this information in aggregated form).
-

3. Use of your personal information

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy. You will only receive unsolicited marketing communications from us if you have consented and can opt-out of receiving them at any time. We do not share your personal information with companies that would send their marketing to you.

Find out more.

We use your personal information in the following ways:

1.1 Where you have provided CONSENT

We may use and process your personal information for the following purposes where you have **consented** for us to do so:

- to contact you via email or SMS (as you have indicated) with marketing information about our products and services (see [Marketing](#) for further details).

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Your rights over your personal information](#) for further details.

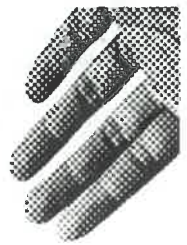
1.2 Where necessary to comply with our LEGAL OBLIGATIONS

We will use your personal information to comply with our legal obligations:

- to keep a record relating the exercise of any of your rights relating to our processing of your personal information;
- to take any actions in relation to health and safety incidents required by law; and
- to handle and resolve any complaints we receive relating to the services we provide.

1.3 Where necessary for us to pursue a LEGITIMATE INTEREST

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes:



Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns

- for analysis and insight conducted to inform our marketing strategies, and to enhance and your visitor experience;
- to tailor and personalise our marketing communications based on your attributes;
- to supply your details to social media and other online platforms operated by other companies for them to contact you with our targeted advertising online, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us;
- to identify and record when you have received, opened or engaged with our website or electronic communications (please see our [Cookie Policy](#) for more information).

Processing necessary for us to support our visitors with their enquiries

- to respond to correspondence you send to us and fulfil the requests you make to us.

Processing necessary for us to respond to changing market conditions and the needs of visitors to our Site and social media pages

- to analyse, evaluate and improve our products and services so that your visit and use of our Site and social media pages are more useful and enjoyable (we will generally use data aggregated from records relating to many people so that it does not identify you personally);
- to undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer;
- for product development purposes.

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

- to administer our Site and our social media pages and for internal operations, including troubleshooting, testing, statistical purposes;
- for the prevention of fraud and other criminal activities;
- to verify the accuracy of data that we hold about you and create a better understanding of you as an account holder or visitor;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- for the purposes of corporate restructure or reorganisation or sale of our business or assets;
- for the purposes of reading and writing cookies which are strictly necessary for the operation of the Site (please see further our [Cookie Policy](#));
- for efficiency, accuracy or other improvements of our databases and systems, for example, by combining systems or consolidating records we hold about you;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings;
- to inform you of updates to our terms and conditions and policies; and
- for other general administration including managing your queries, complaints, or claims, and to send service messages to you.

1.4 Where necessary for us to carry out PRE-CONTRACT STEPS you have requested or for the performance of our CONTRACT



We will use your personal information where this is necessary for us to **perform our contract** with you or to **carry out any pre-contract steps** you've asked us to so that you can enter into that contract, for the following purposes:

- to process your payment card or bank details when taking payment for your orders or when providing a refund; and
- to run our competitions and promotions that you enter from time to time and to distribute prizes.

1.5 Where processing is in your VITAL INTERESTS

We will use your personal information where this is in your vital interest for the following purposes:

- to notify you of any product recall or other safety issues.

Marketing communications: If you give your consent, we may use your personal information to contact you by email or SMS (as you indicate) to send you newsletters or to notify you of special offers, promotions, competitions or new products and services. We try to adapt any marketing material that we send to you, for example by notifying you of special offers or promotions that apply to your interests and in your location. If you do not wish to receive email communications from us, please inform us by using the unsubscribe link inside the email or code within the SMS or by using the contact information at the end of this policy.

If you opt-out of receiving marketing communications from us, we keep your email address on our suppression list for a defined period to ensure that we comply with your wishes. Please see further [The periods for which we retain your personal information](#).

Embedded content: Certain pages, features and other content may appear to be part of this Site but are in fact elements transmitted from third party websites that are not operated by us. For example, we may present videos from a third party video hosting service by framing them within pages on this Site. In some cases, it will be clear that we have incorporated third party elements, whilst in others it may not. These third party websites may use cookies or collect personal information about you when you access the content they host through this Site. For further information, please visit our [Cookie Policy](#).

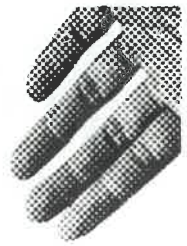
4. Disclosure of your personal information by us

We only disclose your personal information outside our business in limited circumstances. If we do, we will put in place a contract that requires recipients to protect your personal information, unless we are legally required to share that information. Any contractors or recipients that work for us will be obliged to follow our instructions. We do not sell your personal information to third parties. Find out more.

As the controller of your personal information, we decide why and how it is processed. Our responsibility for that processing extends to processing by our service providers if they process your personal information based on our instructions. We also work with other, more independent, organisations in connection with some of the processing activities described in this statement, such as our group companies, social media platforms and certain suppliers.

Where that personal information is collected and sent to other organisations for a processing purpose that is in both our and their interests or where we make decisions together in relation to that particular processing, we will be "joint controllers" with the organisations involved. Where this applies, we and the other organisation will be jointly responsible to you under data protection laws for this processing. If we pass your personal information to an organisation that independently decides why and how to use your personal information then it will be separately responsible to you for that processing and use your personal information in the ways described in its privacy policy (and not ours).

We may disclose your information to our third party service providers, agents and subcontractors (**Suppliers**) for the purposes of providing services to us or directly to you on our behalf, including



the operation and maintenance of our Site and social media pages. Our Suppliers can be categorised as follows:

Recipient / relationship to us	Industry sector (& sub-sector)
Advertising, PR, digital and creative agencies	Media (Advertising & PR)
Banks, payment processors and financial services providers	Finance (Banking & Payment Processing)
Cloud software system providers, including database, email and document management providers	IT (Cloud Services)
Delivery and mailing services providers	Logistics (Delivery Service)
Facilities and technology service providers including scanning and data destruction providers	IT (Data Management)
Social media platforms	Media (Social Media)
Health and safety claims administrators and consultants	Health & Safety (Claims)
Insurers and insurance brokers	Insurance (Underwriting & Broking)
Legal, security and other professional advisers and consultants	Professional Services (Legal & Accounting)
Market and customer research providers	Media (Market Research)
Website and data analytics platform providers	IT (Data Analytics)
Website and App developers	IT (Software Development)
Website hosting services providers	IT (Hosting)



When we use Suppliers, we only disclose to them any personal information that is necessary for them to provide their services and only where we have a contract in place that requires them to keep your information safe and secure.

We may disclose the personal information to other third parties as follows:

-
- social media platforms with whom we work (see further [Our use of social media](#));
 - any third party who is restructuring, selling or acquiring some or all of our business or assets or otherwise in the event of a merger, re-organisation or similar event; and
 - if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or request, including by the police, courts, tribunals or regulators.
-

5. Our use of social media

We use social media platforms in a variety of different ways, including by publishing pages through which you can interact or running competitions. Our legal relationship with each platform will vary with the particular way we are using that platform.

Find out more.

We process your personal information using social media platforms in a variety of ways, as follows:

Pages. We use your personal information when you post content or otherwise interact with us on our official pages on Facebook, Instagram, LinkedIn and other social media platforms. We also use the Page Insights service for Facebook, Instagram and LinkedIn to view statistical information and reports regarding your interactions with the pages we administer on those platforms and their content. Where those interactions are recorded and form part of the information we access through the Page Insights services, we and the relevant platform are joint controllers of the processing necessary to provide that service to us.

Targeted advertising. We use social media platforms to deliver targeted advertising to you via those platforms, unless you object. You may receive advertising because you have previously interacted with us (such as by visiting one of our websites) or because of your profile on a social media platform on which you have an account. You can find out more by consulting the help pages of the relevant social media platform but in summary we use social media platforms to send targeted advertising using two methods:

- ***'Custom audience' targeting.*** You may receive advertising based on information about you that we have provided to the platform or allowed it to collect using cookies/pixels or code embedded in this Site (or a combination of the two). For example, we may target you if you have signed up to our mailing list and where cookies have detected that you have visited this Site in the last month. Please see the paragraph below regarding our use of cookies to send targeted advertising using social media.
- ***'Lookalike audience' Targeting.*** You may also receive advertising because, at our request, the social media platform has identified you as falling within a group or 'audience' whose attributes we have selected, or a group that has similar attributes to you (or a combination of the two).

Cookies. We use cookies and similar technologies in this Site to collect and send information to Meta and LinkedIn about actions you take on this Site. In particular:

- Meta (who operates the Facebook and Instagram platforms) uses this information to provide services to us and also for further processing for its own business purposes. We and Meta are joint controllers of the processing involved in collecting and sending your personal information to Meta using cookies and similar technologies as each of us has a business interest in Meta receiving this information. You can find out more about these technologies by visiting our [Cookie Policy](#). The services we receive from Meta that use this information are delivered to us through Meta's Business Tools, which include Facebook Login (Facebook's single sign-on service, see



above), Facebook Pixel and Website Custom Audiences (which includes 'lookalike audience' targeting). The data from these tools allows us to target advertising to you within Meta's social media platforms by creating audiences based on your actions on our website and applications. They also allow Meta to improve and optimise the targeting and delivery of our advertising campaigns for us. Please see the paragraph above for further information.

- We use LinkedIn Insight Tag, a small piece of code that we embed in this Site that allows us to perform in-depth campaign reporting and unlock insights about users that may visit this Site via our LinkedIn campaigns (e.g. by allowing us to discover business demographics by layering LinkedIn data on data about our Site's visitors). LinkedIn Insight Tag enables the collection of metadata such as IP addresses, timestamps, and events such as page views. You can find out more about these technologies by visiting our [Cookie Policy](#).

Our relationship with Meta and LinkedIn. As we are joint controllers with these platforms for certain processing, we and each platform have:

- entered into agreements in which we have agreed each of our data protection responsibilities for the processing of your personal information described above;
- agreed that we are responsible for providing to you the information in this privacy statement about our relationship with each platform; and
- agreed that each platform is responsible for responding to you when you exercise your rights under data protection law in relation to that platform's processing of your personal information as a joint controller.

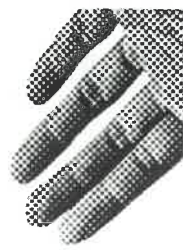
Meta and LinkedIn also process, as our processors, personal information that we submit for the purposes of matching, online targeting, measurement, reporting and analytics purposes. These services include the processing these platforms carry out when they display our advertisements to you in your news feed at our request after matching contact details for you that we have uploaded to them. These advertisements may include forms through which we collect contact information you give to us.

Our relationship with Meta and LinkedIn. As we are joint controllers with these platforms for certain processing, we and each platform have:

- entered into agreements in which we have agreed each of our data protection responsibilities for the processing of your personal information described above;
- agreed that we are responsible for providing to you the information in this privacy statement about our relationship with each platform; and
- agreed that each platform is responsible for responding to you when you exercise your rights under data protection law in relation to that platform's processing of your personal information as a joint controller.

Further information. The Facebook company that is a joint controller of your personal information is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The LinkedIn company that is a joint controller of your personal information is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. For further information regarding these platforms and their use of your personal information, please see:

- Meta's [Controller Addendum for Page Insights](#) and LinkedIn's [Page Insights Joint Controller Addendum](#) which include information regarding how our and those platforms' responsibilities to you are allocated as controllers of your personal information;
- Meta's Data Policy at <https://www.facebook.com/about/privacy> and LinkedIn's Privacy Policy at <https://www.linkedin.com/legal/privacy-policy> which include details of the legal reasons (known as 'lawful bases') on which each platform relies to process your personal information, together with details regarding your data protection rights;
- Meta's [help pages](#) regarding its [Page Insights](#); and



- LinkedIn's [help pages](#) regarding its Page Insights.

6. Transfers of your personal information outside of Europe

Except in a limited number of cases, we do not transfer your personal information outside of Europe. Where we do, we take measures to protect your personal information. Find out more.

Some of the information you provide to us may be transferred to countries outside the UK and European Economic Area (EEA) (including the USA and India). These countries may not have similar data protection laws to the UK and EEA. Countries outside these locations to which we transfer your personal information are listed in the table under [Disclosure of your personal information by us](#).

Where we transfer your information outside of the UK and EEA in this way, we take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected in the ways required by data protection law as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information using standard clauses issued by the UK Secretary of State and relying on decisions they issue declaring that a country is adequately protective of personal information to a degree that allows us to safely transfer your personal information to that country. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy or access to the relevant documents.

If you use our services whilst you are outside the UK and EEA, your information may be transferred outside the UK and EEA in order to provide you with those services.

7. Security and links to other websites

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to our Site may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information. Find out more.

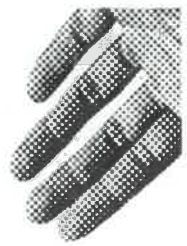
We employ security measures to protect the personal information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage. When we have provided (or you have chosen) a password allowing you access to certain parts of the Site, you are responsible for safeguarding it and keeping it confidential and you promise not to allow it to be used by third parties. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information during its transmission to us online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

Our Site and social media pages may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We are not responsible for the privacy policies and practices of other websites (even if you access them using links that we provide) and we provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

In addition, if you linked to our Site from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

8. The periods for which we retain your personal information

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. For certain purposes we retain your personal information for a short period, whilst for others we retain it for a period of 7 years after the information is no longer required for business reasons so that we can deal with any legal proceedings that could arise.



Find out more.

.We retain your personal information for the following periods:

Type of personal information	When do we receive your personal information?	How long do we keep your personal information after we receive it?
Details regarding when you have consented to receiving marketing from us	When you complete the consent form	2 years from the date you complete the form.
Social media handles	When you follow our social media account or page	Until you stop following our social media account or page.
Location and frequency of your visits	When you create an account on our Site	5 years from the date you create an account.
Information included in any correspondence to our customer care team or via our social media pages	When we receive the correspondence	Up to 7 years to bring, establish or defend legal claims.
Details of your orders	When our systems record your order	3 years
Your identification information in relation to the processing of your personal information	When we receive a submitted loyalty application or voucher redemption from you	3 years



Opinions /other information you give via customer surveys	When you submit your form online	2 years if you have completed a service/product feedback questionnaire, then archived. Up to 2 years for all other research.
Information you give to us when entering a competition	When we receive your completed entry form	5 years, except for the entries themselves which may be kept indefinitely depending on the material provided.
IP addresses and type of device	When you use any of our websites or apps	1 month from the date of collection.
Details of your use of our website, including cookies, pixel and beacon information	When you visit our Site	Various periods - please see our Cookies Policy for details of individual expiry periods of cookies.
Telephone call recordings	From when a your call is answered by our customer care team until the call ends (except when discussing financial information)	6 months

The only exceptions to the periods mentioned above are where:

- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [Your rights in relation to your personal information](#));
- you exercise your right to require us to retain your personal information for a period longer than our stated retention period (see further [Your rights in relation to your personal information](#));



- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible;
- we archive the information, in which case we will delete it in accordance with our deletion cycle; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

9. Your rights in relation to your personal information

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to verify your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 1 month after we have received this information or, where no such information is required, after we have received full details of your request.

Find out more.

You have the following rights, some of which may only apply in certain circumstances:

- to **be informed** about the processing of your personal information (this is what this statement sets out to do);
- ✓ to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- ✓ to **object to processing** of your personal information;
- ✓ to **withdraw your consent** to processing your personal information;
- ✓ to **restrict processing** of your personal information;
- ✓ to have your personal information **erased**;
- ✓ to **request access** to your personal information and information about how we process it;
- ✓ to **electronically move, copy or transfer** your personal information in a standard, machine-readable form; and
- ✓ rights relating to **automated decision making**, including profiling.

To find out more about each of your rights, please click the ✓ icon next to each right above. To exercise these rights, please contact us using the details at the end of this policy.

You have the right to lodge a complaint with the UK data protection regulator. The contact details for the Information Commissioner's Office (**ICO**), the data protection regulator in the UK, are available on the [ICO website](#), where your personal information has or is being used in a way that you believe does not comply with data protection laws, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

10. Changes to our Privacy Policy

Please check this page regularly for changes to this policy. We will email you with changes if we hold a valid email address for you.

Find out more.

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our Site and/or by contacting you by email. Any changes will take effect 7 days after we post the modified terms on our Site or after the date we notify you by email. We recommend you regularly check this page for changes and review this policy each time you visit our Site.



11. Contact and legal information

You can contact us with your queries in relation to this policy or for any other reason by post, email or by phone.

Find out more.

To contact us in relation to this policy, including to exercise any of your rights in relation to your personal information, please contact our Data Protection Team by post at INEOS Hygienics, 38 Hans Crescent SW1X 0LZ, or by email at ineos.hygienics@ineos.com.

For anything else, including general enquiries, please contact us by post at INEOS Hygienics, 38 Hans Crescent SW1X 0LZ, or by phone using a number on our [Contact Us](#) page.

INEOS Hygienic Limited's company registration number is 12572591 and registered office address is School Aycliffe Lane, Newton Aycliffe, Co. Durham, United Kingdom, DL5 6EA.
