



Eriez Magnetics Europe Ltd

Data Privacy Standard (GDPR compliant Policy)

1. Interpretation

1.1 Definitions:

Automated Decision-Making (ADM): when a decision is made which is based solely on Automated Processing (including profiling) which produces legal effects or significantly affects an individual. The GDPR prohibits Automated Decision-Making (unless certain conditions are met) but not Automated Processing.

Automated Processing: any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. Profiling is an example of Automated Processing.

Company name: Eriez Magnetics Europe Limited.

Company Personnel: all employees, workers, contractors, agency workers, consultants, directors, members and others.

Consent: agreement which must be freely given, specific, informed and be an unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear positive action, signifies agreement to the Processing of Personal Data relating to them.

Data Controller: the person or organisation that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with the GDPR. We are the Data Controller of all Personal Data relating to our Company Personnel and Personal Data used in our business for our own commercial purposes.

Data Subject: a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.



Data Privacy Impact Assessment (DPIA): tools and assessments used to identify and reduce risks of a data processing activity. DPIA can be carried out as part of Privacy by Design and should be conducted for all major system or business change programs involving the Processing of Personal Data.

Data Privacy Manager (DPM): the voluntary appointment of a Data Privacy Manager.

Data Privacy Assistant (DPA): the voluntary appointment of a Data Privacy Assistant.

EEA: the 28 countries in the EU, and Iceland, Liechtenstein and Norway.

Explicit Consent: consent which requires a very clear and specific statement (that is, not just action).

General Data Protection Regulation (GDPR): the General Data Protection Regulation ((EU) 2016/679). Personal Data is subject to the legal safeguards specified in the GDPR.

Personal Data: any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Sensitive Personal Data and Pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

Personal Data Breach: any act or omission that compromises the security, confidentiality, integrity or availability of Personal Data or the physical, technical, administrative or organisational safeguards that we or our third-party service providers put in place to protect it. The loss, or unauthorised access, disclosure or acquisition, of Personal Data is a Personal Data Breach.

Privacy by Design: implementing appropriate technical and organisational measures in an effective manner to ensure compliance with the GDPR.

Privacy Guidelines: the Company privacy/GDPR related guidelines provided to assist in interpreting and implementing this Privacy Standard and Related Policies.

Privacy Notices: separate notices setting out information that may be provided to Data Subjects when the Company collects information about them. These notices may take the form of general privacy statements applicable to a specific group of individuals (for example, employee privacy notices or the website privacy policy) or they may be stand-alone, one time privacy statements covering Processing related to a specific purpose.



Processing or Process: any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

Pseudonymisation or Pseudonymised: replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.

Related Policies: the Company's policies, operating procedures or processes related to this Privacy Standard and designed to protect Personal Data.

Sensitive Personal Data: information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

2. Introduction

This Privacy Standard sets out how Eriez Magnetics Europe Limited ("we", "our", "us", "the Company") handle the Personal Data of our customers, suppliers, employees, workers and other third parties.

This Privacy Standard applies to all Personal Data we Process regardless of the media on which that data is stored or whether it relates to past or present employees, workers, customers, clients or supplier contacts, shareholders, website users or any other Data Subject.

This Privacy Standard applies to all Company Personnel ("you", "your"). You must read, understand and comply with this Privacy Standard when Processing Personal Data on our behalf and attend training on its requirements. This Privacy Standard sets out what we expect from you in order for the Company to comply with applicable law. Your compliance with this Privacy Standard is mandatory. Related Policies and Privacy Guidelines are available to help you interpret and act in accordance with this Privacy Standard. You must also comply with all such Related Policies and Privacy Guidelines. Any breach of this Privacy Standard may result in disciplinary action.

This Privacy Standard (together with Related Policies and Privacy Guidelines) is an internal document and cannot be shared with third parties, clients or regulators without prior authorisation from the DPM.



3. Scope

We recognise that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we take seriously at all times. The Company is exposed to potential fines of up to EUR20 million (approximately £18 million) or 4% of total worldwide annual turnover, whichever is higher and depending on the breach, for failure to comply with the provisions of the GDPR.

All directors and department supervisors are responsible for ensuring all Company Personnel comply with this Privacy Standard and need to implement appropriate practices, processes, controls and training to ensure such compliance.

The DPM, with the support of the DPA, is responsible for overseeing this Privacy Standard and as applicable, developing Related Policies and Privacy Guidelines. These posts are held by:

DPM: Katie Owen, Financial Controller, kowen@eriez.com

DPA, Claire Little, HR Officer, clittle@eriez.com

Please contact the DPM with any questions about the operation of this Privacy Standard or the GDPR or if you have any concerns that this Privacy Standard is not being or has not been followed. In particular, you must always contact the DPM in the following circumstances:

- (a) if you are unsure of the lawful basis which you are relying on to process Personal Data (including the legitimate interests used by the Company) (see [section 5.1](#) below);
- (b) if you need to rely on Consent and/or need to capture Explicit Consent (see [section 5.2](#) below);
- (c) if you need to draft Privacy Notices (see [section 5.3](#) below);
- (d) if you are unsure about the retention period for the Personal Data being Processed (see [9.1](#) below);
- (e) if you are unsure about what security or other measures you need to implement to protect Personal Data (see [section 10.1](#) below);
- (f) if there has been a Personal Data Breach ([section 10.2](#) below);
- (g) if you are unsure on what basis to transfer Personal Data outside the EEA (see [section 11](#) below);
- (h) if you need any assistance dealing with any rights invoked by a Data Subject (see [section 12](#));



- (i) whenever you are engaging in a significant new, or change in, Processing activity which is likely to require a DPIA (see [section 13.4](#) below) or plan to use Personal Data for purposes others than what it was collected for;
- (j) If you plan to undertake any activities involving Automated Processing including profiling or Automated Decision-Making (see [section 13.5](#) below);
- (k) If you need help complying with applicable law when carrying out direct marketing activities (see [section 13.6](#) below); or
- (l) if you need help with any contracts or other areas in relation to sharing Personal Data with third parties (including our vendors) (see [section 13.7](#) below).

4. Personal data protection principles

We adhere to the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:

- (a) Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
- (b) Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
- (c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
- (d) Accurate and where necessary kept up to date (Accuracy).
- (e) Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
- (f) Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
- (g) Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
- (h) Made available to Data Subjects and Data Subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).



5. Lawfulness, fairness, transparency

5.1 Lawfulness and fairness

Personal data must be Processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

You may only collect, Process and share Personal Data fairly and lawfully and for specified purposes. The GDPR restricts our actions regarding Personal Data to specified lawful purposes. These restrictions are not intended to prevent Processing, but ensure that we Process Personal Data fairly and without adversely affecting the Data Subject.

The GDPR allows Processing for specific purposes, some of which are set out below:

- (a) the Data Subject has given his or her Consent;
- (b) the Processing is necessary for the performance of a contract with the Data Subject;
- (c) to meet our legal compliance obligations.;
- (d) to protect the Data Subject's vital interests;
- (e) to pursue our legitimate interests for purposes where they are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of Data Subjects. The purposes for which we process Personal Data for legitimate interests need to be set out in applicable Privacy Notices.

You must identify and document the legal ground being relied on for each Processing activity.

5.2 Consent

A Data Controller must only process Personal Data on the basis of one or more of the lawful bases set out in the GDPR, which include Consent.

A Data Subject consents to Processing of their Personal Data if they indicate agreement clearly either by a statement or positive action to the Processing. Consent requires affirmative action so silence, pre-ticked boxes or inactivity are unlikely to be sufficient. If Consent is given in a document which deals with other matters, then the Consent must be kept separate from those other matters.

Data Subjects must be easily able to withdraw Consent to Processing at any time and withdrawal must be promptly honoured. Consent may need to be refreshed if you intend to Process Personal Data for a different and incompatible purpose which was not disclosed when the Data Subject first consented.



Unless we can rely on another legal basis of Processing, Explicit Consent is usually required for Processing Sensitive Personal Data, for Automated Decision-Making and for cross border data transfers. Usually we will be relying on another legal basis (and not require Explicit Consent) to Process most types of Sensitive Data. Where Explicit Consent is required, you must issue a Data Privacy Notice to the Data Subject to capture Explicit Consent.

You will need to evidence Consent captured and keep records of all Consents so that the Company can demonstrate compliance with Consent requirements.

5.3 Transparency (notifying data subjects)

The GDPR requires Data Controllers to provide detailed, specific information to Data Subjects depending on whether the information was collected directly from Data Subjects or from elsewhere. Such information must be provided through appropriate Privacy Notices which must be concise, transparent, intelligible, easily accessible, and in clear and plain language so that a Data Subject can easily understand them.

Whenever we collect Personal Data directly from Data Subjects, including for human resources or employment purposes, we must provide the Data Subject with all the information required by the GDPR including the identity of the Data Controller and DPM, how and why we will use, Process, disclose, protect and retain that Personal Data through a Data Privacy Notice which must be presented when the Data Subject first provides the Personal Data.

When Personal Data is collected indirectly (for example, from a third party or publically available source), you must provide the Data Subject with all the information required by the GDPR as soon as possible after collecting/receiving the data. You must also check that the Personal Data was collected by the third party in accordance with the GDPR and on a basis which contemplates our proposed Processing of that Personal Data.

6 Purpose limitation

Personal Data must be collected only for specified, explicit and legitimate purposes. It must not be further Processed in any manner incompatible with those purposes.

You cannot use Personal Data for new, different or incompatible purposes from that disclosed when it was first obtained unless you have informed the Data Subject of the new purposes and they have Consented where necessary.



7 Data minimisation

Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed.

You may only Process Personal Data when performing your job duties requires it. You cannot Process Personal Data for any reason unrelated to your job duties.

You may only collect Personal Data that you require for your job duties: do not collect excessive data. Ensure any Personal Data collected is adequate and relevant for the intended purposes.

You must ensure that when Personal Data is no longer needed for specified purposes, it is deleted or anonymised in accordance with the Company's data retention guidelines.

8 Accuracy

Personal Data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.

You will ensure that the Personal Data we use and hold is accurate, complete, kept up to date and relevant to the purpose for which we collected it. You must check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. You must take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

9 Storage limitation

Personal Data must not be kept in an identifiable form for longer than is necessary for the purposes for which the data is processed.

You must not keep Personal Data in a form which permits the identification of the Data Subject for longer than needed for the legitimate business purpose or purposes for which we originally collected it including for the purpose of satisfying any legal, accounting or reporting requirements.

The Company will maintain retention policies and procedures to ensure Personal Data is deleted after a reasonable time for the purposes for which it was being held, unless a law requires such data to be kept for a minimum time.



You will take all reasonable steps to destroy or erase from our systems all Personal Data that we no longer require in accordance with all the Company's applicable records retention schedules and policies. This includes requiring third parties to delete such data where applicable.

You will ensure Data Subjects are informed of the period for which data is stored and how that period is determined in any applicable Privacy Notice.

10 Security integrity and confidentiality

10.1 Protecting Personal Data

Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

We will develop, implement and maintain safeguards appropriate to our size, scope and business, our available resources, the amount of Personal Data that we own or maintain on behalf of others and identified risks (including use of encryption and Pseudonymisation where applicable). We will regularly evaluate and test the effectiveness of those safeguards to ensure security of our Processing of Personal Data. You are responsible for protecting the Personal Data we hold. You must implement reasonable and appropriate security measures against unlawful or unauthorised Processing of Personal Data and against the accidental loss of, or damage to, Personal Data. You must exercise particular care in protecting Sensitive Personal Data from loss and unauthorised access, use or disclosure.

You must follow all procedures and technologies we put in place to maintain the security of all Personal Data from the point of collection to the point of destruction. You may only transfer Personal Data to third-party service providers who agree to comply with the required policies and procedures and who agree to put adequate measures in place, as requested.

You must maintain data security by protecting the confidentiality, integrity and availability of the Personal Data, defined as follows:

- (a) Confidentiality means that only people who have a need to know and are authorised to use the Personal Data can access it.
- (b) Integrity means that Personal Data is accurate and suitable for the purpose for which it is processed.
- (c) Availability means that authorised users are able to access the Personal Data when they need it for authorised purposes.



You must comply with and not attempt to circumvent the administrative, physical and technical safeguards we implement and maintain in accordance with the GDPR and relevant standards to protect Personal Data.

10.2 Reporting a Personal Data Breach

The GDPR requires Data Controllers to notify any Personal Data Breach to the applicable regulator and, in certain instances, the Data Subject.

We have put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where we are legally required to do so.

If you know or suspect that a Personal Data Breach has occurred, do not attempt to investigate the matter yourself. Immediately contact the DPM. You should preserve all evidence relating to the potential Personal Data Breach.

11 Transfer limitation

The GDPR restricts data transfers to countries outside the EEA in order to ensure that the level of data protection afforded to individuals by the GDPR is not undermined. You transfer Personal Data originating in one country across borders when you transmit, send, view or access that data in or to a different country.

We will transfer the personal information we collect about you to our parent company Eriez Magnetics in the United States of America in order to perform our contract with you. Eriez US complies with the EU-US Privacy Shield Principles. This means that the Eriez US to whom we transfer your data are is deemed to provide an adequate level of protection for your personal information.

12 Data Subject's rights and requests

Data Subjects have rights when it comes to how we handle their Personal Data. These include rights to:

- (a) withdraw Consent to Processing at any time;
- (b) receive certain information about the Data Controller's Processing activities;
- (c) request access to their Personal Data that we hold;
- (d) prevent our use of their Personal Data for direct marketing purposes;
- (e) ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or Processed or to rectify inaccurate data or to complete incomplete data;



- (f) restrict Processing in specific circumstances;
- (g) challenge Processing which has been justified on the basis of our legitimate interests or in the public interest;
- (h) request a copy of an agreement under which Personal Data is transferred outside of the EEA;
- (i) object to decisions based solely on Automated Processing, including profiling (ADM);
- (j) prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else;
- (k) be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms;
- (l) make a complaint to the supervisory authority; and
- (m) in limited circumstances, receive or ask for their Personal Data to be transferred to a third party in a structured, commonly used and machine readable format.

You must verify the identity of an individual requesting data under any of the rights listed above (do not allow third parties to persuade you into disclosing Personal Data without proper authorisation).

You must immediately forward any Data Subject request you receive to the DPM.

13 Accountability

13.1 The Data Controller must implement appropriate technical and organisational measures in an effective manner, to ensure compliance with data protection principles. The Data Controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.

The Company must have adequate resources and controls in place to ensure and to document GDPR compliance including:

- (a) appointing a an executive accountable for data privacy;
- (b) implementing Privacy by Design when Processing Personal Data and completing DPIAs where Processing presents a high risk to rights and freedoms of Data Subjects;
- (c) integrating data protection into internal documents including this Privacy Standard, Related Policies, Privacy Guidelines, Privacy Notices;
- (d) regularly training Company Personnel on the GDPR, this Privacy Standard, Related Policies and Privacy Guidelines and data protection matters including, for example, Data Subject's rights, Consent, legal basis, DPIA and Personal Data Breaches. The Company must maintain a record of training attendance by Company Personnel



13.2 Record keeping

The GDPR requires us to keep full and accurate records of all our data Processing activities.

You must keep and maintain accurate corporate records reflecting our Processing including records of Data Subjects' Consents and procedures for obtaining Consents.

These records should include, at a minimum, the name and contact details of the Data Controller and the DPM, clear descriptions of the Personal Data types, Data Subject types, Processing activities, Processing purposes, third-party recipients of the Personal Data, Personal Data storage locations, Personal Data transfers, the Personal Data's retention period and a description of the security measures in place.

13.3 Training and audit

We are required to ensure all Company Personnel have undergone adequate training to enable them to comply with data privacy laws. We must also regularly test our systems and processes to assess compliance.

You must undergo all mandatory data privacy related training and ensure your team undergo similar mandatory training.

You must regularly review all the systems and processes under your control to ensure they comply with this Privacy Standard and check that adequate governance controls and resources are in place to ensure proper use and protection of Personal Data.

13.4 Privacy By Design and Data Protection Impact Assessment (DPIA)

We are required to implement Privacy by Design measures when Processing Personal Data by implementing appropriate technical and organisational measures (like Pseudonymisation) in an effective manner, to ensure compliance with data privacy principles.

You must assess what Privacy by Design measures can be implemented on all programs/systems/processes that Process Personal Data by taking into account the following:

- (a) the state of the art;
- (b) the cost of implementation;
- (c) the nature, scope, context and purposes of Processing; and
- (d) the risks of varying likelihood and severity for rights and freedoms of Data Subjects posed by the Processing.



As the Company does not engage in high risk Processing, conducting a DPIA will not be required. The need to conduct a DPIA will be reviewed should the Company's use of personal data change in any way.

13.5 Automated Processing (including profiling) and Automated Decision-Making

Generally, ADM is prohibited when a decision has a legal or similar significant effect on an individual unless:

- (a) a Data Subject has Explicitly Consented;
- (b) the Processing is authorised by law; or
- (c) the Processing is necessary for the performance of or entering into a contract.

If certain types of Sensitive Data are being processed, then grounds (b) or (c) will not be allowed but such Sensitive Data can be Processed where it is necessary (unless less intrusive means can be used) for substantial public interest like fraud prevention.

If a decision is to be based solely on Automated Processing (including profiling), then Data Subjects must be informed when you first communicate with them of their right to object. This right must be explicitly brought to their attention and presented clearly and separately from other information. Further, suitable measures must be put in place to safeguard the Data Subject's rights and freedoms and legitimate interests.

We must also inform the Data Subject of the logic involved in the decision making or profiling, the significance and envisaged consequences and give the Data Subject the right to request human intervention, express their point of view or challenge the decision.

A DPIA must be carried out before any Automated Processing (including profiling) or ADM activities are undertaken.

13.6 Direct marketing / Website Cookies

The Company occasionally undertakes Direct Marketing by email.

We are subject to certain rules and privacy laws when marketing to our customers.

For example, a Data Subject's prior consent is required for electronic direct marketing (for example, by email, text or automated calls). The limited exception for existing customers known as "soft opt in" allows organisations to send marketing texts or emails if they have obtained contact details in the course of a sale to that person, they are marketing similar products or services, and they gave the person an opportunity to opt out of marketing when first collecting the details and in every subsequent message.



The right to object to direct marketing must be explicitly offered to the Data Subject in an intelligible manner so that it is clearly distinguishable from other information.

A Data Subject's objection to direct marketing must be promptly honoured. If a customer opts out at any time, their details should be suppressed as soon as possible. Suppression involves retaining just enough information to ensure that marketing preferences are respected in the future.

The Company utilises cookies to create a more customised experience for our users and customers. For example, we use tracking pixels (i.e. Google Analytics and Lead Forensics Software) to aid in measuring and tracking where our website traffic is coming from and to track the performance of our site.

When you enter the Site, your computer will automatically be issued with a cookie. Cookies in themselves do not identify the individual user, just the computer used. Many websites do this whenever a user visits their website in order to track traffic flows. If you wish to reject our cookies, you can configure your browser to do so. Information on how to block cookies can normally be found within the help features of your browser. Alternatively you can ask your internet browser to alert you when a cookie is being set up.

13.7 Sharing Personal Data

Generally we are not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.

You may only share the Personal Data we hold with another employee, agent or representative of our group (which includes our subsidiaries and our ultimate holding company along with its subsidiaries) if the recipient has a job-related need to know the information and the transfer complies with any applicable cross-border transfer restrictions.

You may only share the Personal Data we hold with third parties, such as our service providers if:

- (a) they have a need to know the information for the purposes of providing the contracted services;
- (b) sharing the Personal Data complies with the Privacy Notice provided to the Data Subject and, if required, the Data Subject's Consent has been obtained;
- (c) the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- (d) the transfer complies with any applicable cross border transfer restrictions; and
- (e) the third party has provided a written copy of their Privacy Standards.

14 Data Protection Measures

- 14.1 The Company shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:
- (a) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded and electronic copies should be deleted.
 - (b) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances.
 - (c) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
 - (d) Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted;
 - (e) Where Personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
 - (f) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using Royal Mail Special Delivery service or Courier, clearly marked Private & Confidential.
 - (g) No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to; such access should be formally requested from the DPM.
 - (h) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
 - (i) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of the DPM.
 - (j) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time;
 - (k) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
 - (l) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to the Company or otherwise without the formal written approval of the DPM and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary.
 - (m) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken)



- (n) All personal data stored electronically is backed up hourly, daily, weekly and monthly. The Company uses Datto for back-up which has a 12 month retention.
- (o) All electronic copies of personal data should be stored securely using passwords.
- (p) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.
- (q) Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- (r) Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of Gareth Meese, Sales Director, gmeese@eriez.com to ensure that no data subjects have added their details to any marketing preference databases including, but not limited to, the Telephone Preference Service, the Mail Preference Service, the Email Preference Service, and the Fax Preference Service. Such details should be checked at least once a year.

15 Organisational Measures

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- (a) All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;
- (b) Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
- (c) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- (d) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;
- (e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;
- (f) The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- (g) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;
- (h) All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the Regulation;



- (i) Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

16 Changes to this Privacy Standard

We reserve the right to change this Privacy Standard at any time without notice to you so please check back regularly to obtain the latest copy of this Privacy Standard.

This Privacy Standard does not override any applicable national data privacy laws and regulations in countries where the Company operates.

17 Implementation of Policy

This Policy shall be deemed effective as of 1st July 2021. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name:	John Curwen
Position:	Managing Director
Date:	1 st July 2021
Signature:	