

Privacy Policy And Privacy Notice

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how TES group collects and processes your personal data:

(a) through your use of our websites (including <https://www.tes-amm.com> and all other of our websites), including any data you may provide through our website when you fill out the Contact Form, sign up to our newsletter, purchase a product or service, take part in a promotion or otherwise interact with us via our website; and

(b) when you deal or interact or communicate with TES through any channel (via our systems, by email, post, phone, other electronic communications or otherwise) as a customer, supplier or service provider (actual or potential), or in a journalistic, press or other capacity (although potential and actual candidates or employees should read the next paragraph below).

This privacy notice is designed to comply with the new General Data Protection Regulation ((EU) 2016/679) (GDPR) which comes into force on 25th May 2018, to the extent applicable to processing of personal data by TES group.

Candidates and Employees – If you are a potential candidate and are contacting us with a view to joining the company, how we hold and process your data is dealt with in our Candidate Policy. If you join us as an employee, your personal data will be held and processed as detailed in our Employee Privacy Policy that will be made available to you at the start of your employment or as otherwise required by GDPR.

Other privacy notices: It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

ABOUT TES GROUP AND WHO THE CONTROLLER OF DATA IS

TES group is made up of different legal entities in different countries in the European Union (EU) and around the world, details of which can be found here. The headquarters of TES group is in Singapore and is operated by TES Singapore Pte Ltd]. This privacy notice is issued on behalf of the TES group so when we mention TES, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the TES group responsible for processing your data.

We identify which entity will be the controller for your data in Table 2 (Paragraph 6) below or will identify the data controller when our relationship with you (or the business or enterprise you represent) is known, for example, when you purchase a product or service from us.

Data protection officer – We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CONTACT DETAILS

Our full details are as follows]:

Full name of legal entity: TES Europe Holding Ltd.

Name or title: Data Protection Officer (DPO)

Email address: DPO_EU@tes-amm.com

Postal address:

TES-AMM UK Ltd.,
Blakeney Way
Kingswood Lakeside
Cannock
WS11 8JB

Your request will be sent to the relevant data controller within TES group. The contact details of the relevant data controller are set out here.

Right to make complaint – To the extent that you are in the EU or the General GDPR otherwise applies to the processing of your personal data (because for example processing of your data takes place in or in the context of our activities in the EU) you have the right to make a complaint at any time to the relevant national data protection authority:

- France – Commission Nationale de l’Informatique et des Libertés (CNIL), (www.cnil.fr)
- Germany – Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit, (www.bfdi.bund.de/)
- Italy – Garante per la protezione dei dati personali, (www.garanteprivacy.it)
- Spain – Agencia de Protección de Datos, (www.agpd.es)
- Sweden – Datainspektionen, (www.datainspektionen.se)
- United Kingdom – Information Commissioner’s Office (ICO), (www.ico.org.uk).

A list of national data protection authorities in other countries can be downloaded here.

We would, however, appreciate the chance to deal with your concerns before you approach the relevant data protection authority so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version of the notice was last updated on 18 September 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third Party Links – This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The personal data TES collects will depend on the nature of your interaction with TES. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Information collected from the individual:

- **Contact Data** – Personal and/or business contact data such as first name, last name, mailing address, telephone number, fax number, email address and other contact information.
- **Account Data** – Information provided when signing up for services provided by TES, transactions, support history, type of service provided by TES
- **Location Data** – Address data for any location-based service.
- **Security Credentials** – User names and passwords for authentication and access to Services provided by TES.
- **Identity Data** includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].
- **Financial Data** includes [bank account and payment card details.
- **Social Media Data** – Social media features that enable individuals to share information with social networks and to interact with TES on various social media sites, may result in the collection or sharing of information about the individual

Data collected from other sources

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you or your business, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how (or your business) use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and **share aggregated data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly

or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If you are a potential or actual candidate or employee please read paragraph headed Candidates and Employees under Paragraph 1.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, depending on the capacity in which you interact with us, including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data we collect when:
 - You fill out the Contact Form on our websites
 - Where you are a customer and you give us contact or information for entering onto our systems for the purposes of delivery of our goods or services
 - Where you are a customer or potential customer, apply for our products or services;
 - You create an account with us on our website or otherwise;
 - You subscribe to our service or publications;
 - You request marketing to be sent to you;
 - You enter a promotion or survey; or
 - Give us some feedback.
 - You request or need sales and order support, including when we assist you in completing orders of products or services and arrange shipments.
 - You request or need service support including when we communicate with you about services provided by TES, which may include responses to your inquiries or requests or updates on service delivery.
 - We carry out ordinary business operations, including recruiting, verifying your identity, corporate reporting and management, staff training and carrying out quality assurance purposes.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **From your business or enterprise:** In order to provide goods or services to you or the business or enterprise you represent, your business contact data may be provided to or collected by TES by your business or enterprise or other persons in your business or enterprise.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - analytics providers such as Google based outside the EU;
 - search information providers
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services
- Contact Data from data brokers, aggregators or other third parties
- Identity or Contact Data from publicly available sources such as Companies House and the Electoral Register based inside or outside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message [or where you input contact data via the Contact Form on our website].

You have the right to withdraw consent (to marketing or any other consent) at any time by Contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

(b) Asking you to leave a review or take a survey		(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To carry out group organization and intra group transfers	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To ensure network, information and system security	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	1. a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, businessreorganisationor group restructuring exercise) (b) Necessary to comply with a legal obligation

To participate and comply with industry watch-lists and industry self-regulatory schemes	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	1. a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, businessreorganisationor group restructuring exercise) 2. (b) Necessary to comply with a legal obligation
To carry out corporate operations and due diligence (reporting of management information, operation of financial/risk/credit models, back office operation, managing third party service providers, corporate reorganisations)	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	1. a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, businessreorganisation or group restructuring exercise) 2. (b) Necessary to comply with a legal obligation
To report potential crimes to relevant authorities	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	1. a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security) 2. (b) Necessary to comply with a legal obligation
To detect and prevent fraud and crime	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	1. a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security) 2. (b) Necessary to comply with a legal obligation

Note : Processing of employee administration, operations and recruitment are set out in the relevant employee or candidate privacy policy. We may need to transfer your personal data to other entities within TES group for the purposes for responding to your enquiries or providing services to you.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will market to you in accordance with the marketing choices you make to the extent that we are permitted by and in accordance with applicable data protection laws.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You may receive

marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

Where we are required by GDPR to obtain your consent, we will get your express opt-in consent before we share your personal data with any company outside the TES group of companies for marketing purposes.

OPTING OUT

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by Contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of and for use in respect of a product/service purchase, warranty registration, product/service experience or other transactions or other non -marketing purposes outlined in this notice.

COOKIES

TES websites use so-called cookies in various locations. They help make our offering more user-friendly, more effective and safer. Cookies are small text files which are deposited on your computer and stored by your browser. Most of the cookies used by TES are session cookies that are automatically deleted at the end of your visit. TES do not use cookies for the collection of personal data such as personal names or e-mail addresses. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about how to disable the cookies please consult the information pages of the provider of the browser you are using. About the cookies we use, please see below:

General:

You can always visit our website without us requiring personal details from you. When you visit our homepage, we learn solely the following information:

- the name of your internet provider,
- the website you are visiting,
- the technical version of your browser,
- your operating system,
- your IP address,
- the time of your visit to our site,
- the sites you access from our site.

This information is not attributable to particular persons. TES holds sole authority over all data which is collected during your visit to the TES website. This information is used solely in the stated manner and is not sold to third parties, not used conjointly with third parties, nor distributed to them.

Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the

United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by applicable law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- **Internal Third Parties** as set out in the Glossary. TES may transfer personal data to other TES group companies throughout the world including the TES (Singapore) Pte Ltd, headquarters of the TES group for the purposes outlined in this privacy notice. TES group entities are contractually bound to comply with our privacy requirements in accordance with the requirements of applicable data protection laws.
- **External Third Parties** as set out in the Glossary.
- **Specific third parties** listed in the Table 1 in Paragraph 4 above.
- **Third parties** to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

As required by local data protection regulations the individual may exercise certain Data Subject Rights of information, access, rectification, restrict processing or erasure by directly contacting the TES entity who is the controller (as specified in this notice or otherwise communicated to the data subject). TES companies outside the EEA have appointed their representative (a TES company) within the EEA as required by GDPR. The Table 2 sets out the TES entity who is the representative.

Table 2: TES data controllers & GDPR responsables

Country	TES entity	Address	Data Controller	GDPR Representative
China	TES-AMM CORPORATION CHINA LTD	No. 358, Xing shun Rd Jiading District Shanghai, P.R.C 201815	TES-AMM CORPORATION CHINA LTD	TES-AMM Europe Holding Ltd
	TES-AMM (BEIJING) CO., LTD	No.22, Jing Sheng zhong Jie Zhongguancun Science Park Tongzhou District Beijing PR China 101012	TES-AMM (BEIJING) CO., LTD	TES-AMM Europe Holding Ltd
	TES-AMM GUANGZHOU) CO., LTD	Rm.101, Building D Guangzheng Logistic & Industrial Park No: 11 Nanyunwu Rd Luogang District Guangzhou PR China 510663	TES-AMM GUANGZHOU) CO., LTD	TES-AMM Europe Holding Ltd
	TES-AMM (SUZHOU) E-WASTE SOLUTIONS CO. LTD	#48 Shi Yang Road Suzhou New District Suzhou Jiangsu PR China 215151	TES-AMM (SUZHOU) E-WASTE SOLUTIONS CO. LTD	TES-AMM Europe Holding Ltd
Hong Kong	TES-AMM (H.K.) Ltd		TES-AMM (H.K.) Ltd	TES-AMM Europe Holding Ltd
Indonesia	T. TES-AMM INDONESIA	Jl Tanjung no 17 Multiniaga 2. Lippo Cikarang Bekasi 17550	T. TES-AMM INDONESIA	TES-AMM Europe Holding Ltd

Japan	TES-AMM JAPAN K.K.	Miyashimo 1-2-31 Chuo-ku Sagamihara-shi Kanagawa 252-0212	TES-AMM JAPAN K.K.	TES-AMM Europe Holding Ltd
Malaysia	TES-AMM (MALAYSIA) SDN BHD	No. 3076 (Plot 25D), Jalan Jelawat Mukim 1, Taman Perindustrian Seberang Jaya 13600 Seberang Perai Tengah, PULAU PINANG	TES-AMM (MALAYSIA) SDN BHD	TES-AMM Europe Holding Ltd
Philippines	TES-AMM PHILIPINES, INC.	Unit 104, Central Business Park No. 461 Amang Rodriguez Ave Manggahan Pasig City, 1611	TES-AMM PHILIPINES, INC.	TES-AMM Europe Holding Ltd
Singapore	TES-AMM (SINGAPORE) PTE. LTD	9 Benoi Sector 629844 Singapore	TES-AMM (SINGAPORE) PTE. LTD	TES-AMM Europe Holding Ltd
South Korea	TES-AMM KOREA INC.	107, Songjung-Ri Mado-Myun, -Si Hwasung Kyonggi-Do	TES-AMM KOREA INC.	TES-AMM Europe Holding Ltd
Taiwan	TES-AMM (TAIWAN) CO., LTD	No. 79 Jhongsing Rd Lujhu District, Taoyuan City 33857 Taiwan (R.O.C)	TES-AMM (TAIWAN) CO., LTD	TES-AMM Europe Holding Ltd
Thailand	TES-AMM (THAILAND) CO., LTD	107 Moo 1, T. Banlen, A.Bang Pa-In Phra Nakhon Si Ayutthaya 13160 Thailand	TES-AMM (THAILAND) CO., LTD	TES-AMM Europe Holding Ltd
Vietnam	TES-AMM (Vietnam) CO., LTD	Room A, Third Floor A Chau Building 24 Linh Lang Street Cong Vi Ward	TES-AMM (Vietnam) CO., LTD	TES-AMM Europe Holding Ltd

		Ba Dinh District, Hanoi		
Australia	TES-AMM AUSTRALIA PTY LTD	No: 1 Marple Avenue Villawood NSW 2163 PO Box 448 Chester Hill NSW 2162	TES-AMM AUSTRALIA PTY LTD	TES-AMM Europe Holding Ltd
	TES-AMM AUSTRALIA PTY LTD	23 Fillo drive Somerton VIC 3062	TES-AMM AUSTRALIA PTY LTD	TES-AMM Europe Holding Ltd
	TES-AMM AUSTRALIA PTY LTD	23 Fillo drive Somerton VIC 3062	TES-AMM AUSTRALIA PTY LTD	TES-AMM Europe Holding Ltd
New Zealand	TES-AMM NEW ZEALAND LIMITED	89 Lansford Crescent Avondale 1026	TES-AMM NEW ZEALAND LIMITED	TES-AMM Europe Holding Ltd
France	DATASERV SAS	ZAE La Biste 226 rue Jean-Baptiste Calvignac 34670 Baillargues	DATASERV SAS	N/A
Germany	TES-AMM Central Europe GmbH	Blitzkuhlenstrasse 169, 45659 Recklinghausen, GERMANY	TES-AMM Central Europe GmbH	TES-AMM Europe Holding Ltd
Italy	TES-AMM Italia SRL.	Via Glenn Curtiss, 3 25018 Montichiari (BS)	TES-AMM Italia SRL.	N/A
Spain	Tes- amm <i>España</i> Asset Recovery And Recycling <i>Sl</i>	Carretera de Boadilla del Monte Km 5 800 28925 Alcorcon Madrid	Tes- amm <i>España</i> Asset Recovery And Recycling <i>Sl</i>	N/A
Sweden	Dataserv AB	Kylvägen 6 556 52 Jonkoping	Dataserv AB	N/A

UK	TES-AMM (Europe) Ltd	10, Crompton Way North Newmoor Irvine North Ayrshire KA11 4HU	TES-AMM (Europe) Ltd	N/A
	TES-AMM (Europe) Ltd		TES-AMM (Europe) Ltd	N/A
	TES Ltd	Blakeney Way Kingswood Lakeside Cannock WS11 8JB	TES Ltd	N/A
	TESAMM Europe Holding Ltd	Blakeney Way Kingswood Lakeside Cannock WS11 8JB	TESAMM Europe Holding Ltd	N/A
USA	TES USA	3475 Lee Hill Drive Fredericksburg, VA 22408	TES USA	TES-AMM Europe Holding Ltd
		5238 Royal Woods Parkway Suite 110 Tucker, GA 30084	TES USA	TES-AMM Europe Holding Ltd

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

General: transfers of personal data from inside the EEA to outside the EEA

Whenever we transfer your personal data from inside the EEA to outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we transfer personal data from TES companies in the EEA to TES companies outside the EEA, we will do at least one of the following:

- Use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries; or
- requiring all our group companies to follow the same rules when processing your personal data. These rules are called “binding corporate rules”. For further details, see European Commission: Binding corporate rules.]
- For transfers of your personal data made via our website at your request, we will obtain your consent to the transfer of such personal data to the country specified by you in the Contact Form.

Transfer of personal data to other TES group companies via our website

Personal data may be collected by TES via our website when the website user submits a Contact Form or other equivalent form on our website. In such cases, the user is required to select a TES entity or a country from a drop-down menu on our website (the countries in this menu are countries in which TES has a group company or where an TES entity is offering services) to indicate which country (and corresponding TES group company) the user (or business they represent) wishes to contact. Such personal data will be used by the TES entity in the selected country in order to deal with the query and to manage the relationship between the user (and/or relevant organization that the person represents) and TES.

Accordingly, based on the selection of the individual, the personal data of the individual may be transferred to other entities within the TES group inside and outside of the EU. These data transfers are carried out with the consent of the individual.

How we coordinate responses within TES group to your data subject requests

As required by local data protection regulations the individual may exercise certain Data Subject Rights (see Paragraph 9 : Your Rights) by directly contacting the TES entity who is the controller (as specified in this notice or otherwise communicated to the data subject). The Table 2 above sets out the TES entity who has responsibility for coordinating our responses to individuals making data subject requests or other data protection enquiries.

Please Contact us if you want further information on the specific mechanism used by us when transferring your personal data from within the EEA to outside of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for up to 10 years after they cease being customers for tax or other legal purposes. This period can vary from country to country and the regulatory and legal requirements in those countries. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by Contacting us.

In some circumstances you can ask us to delete your data: see Request erasure below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please Contact us. A copy of your request will be sent to the data controller.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or

excessive. Alternatively, we may refuse to comply with your request in these circumstances to the extent permitted by applicable laws including GDPR.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. Our legitimate interests include for example: to detect and prevent fraud and crime ; administrative purposes; reporting potential crimes to relevant authorities; intra group transfers; employee administration, operations and recruitment; ensuring network, information and system security; participate and comply with industry watch-lists and industry self-regulatory schemes; corporate operations and due diligence (reporting of management information, operation of financial/risk/credit models, back office operation, managing third party service providers, corporate reorganisations) We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us. Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

INTERNAL THIRD PARTIES

Other companies in the TES Group acting as joint controllers or processors and who are based in countries inside and outside the EU, as specified here and provide or carry out: IT and system administration services, leadership or group reporting, service delivery, the role of group headquarters, any of the other purposes and functions set out in Table 1, compliance with applicable data protection laws and duties.

EXTERNAL THIRD PARTIES

Service providers acting as processors who manage or support operations on behalf of TES. These service providers may be located inside or outside the EEA and may provide services such as order fulfillment, product / material collection or delivery, IT services, email service providers, data hosting, management or support, TES websites or other outsourced services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the relevant countries in which the relevant TES companies operate inside and outside the EEA, who provide consultancy, banking, legal, insurance, accounting or other related services.

Tax authorities (for example in the UK HM Revenue & Customs), regulators and other authorities acting as processors or joint controllers based inside and outside the EEA who require reporting of processing activities in certain circumstances.

10. ITAM Review Webinar

The privacy notice below provides further information about how we use your personal information when you [attend our event](#), and shall be read in conjunction with the TES privacy policy.

The personal data we process will be as set out in the form to register such as your title, name, and full postal, email or telephone contact details; your job title and role.

When using applications such as Zoom or Microsoft Teams, your name, user name, email address, your computer's IP address, MAC address and device name may be collected by us and the companies who own these applications in order to schedule and create a record of meetings, improve and tailor your experience when using these applications .

We will process your personal data for the following purposes: To reserve a place for and provide you with information about the event(s) including how to access the event; To fulfil and monitor our legal responsibilities, in accordance with your preferences, to communicate with you about other events, news, and opportunities relating to the event.

Where video conferencing applications are used to record meetings, personal data captured within the recording are stored within the cloud service owned by that company. Where recording is taking place, you will be notified at the beginning of or as you enter the recording session.

Data held and used by us are compliant with GDPR. Personal data stored by a service provider within the cloud may be stored outside of the European Economic Area. Any transfers outside the EEA will be in accordance with data protection law.

The information shared will only be used to provide the service required and will not be retained by these external organisations after the event is concluded.