SMART MANUFACTURING TECHNOLOGY

PRIVACY NOTICE

(EXTERNAL)

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CONTACT DETAILS

Contact: Privacy Team

Address: 1 Clifton Lane, Wilford, Nottingham, NG11 7AT

E-mail: privacy@smartmt.com

Website: smartmt.com

INTRODUCTION

We are Smart Manufacturing Technology (SMT), a global engineering solutions and services provider dedicated to providing leading engineers with the expertise and tools to deliver innovative powertrain technology. Our Head Office is in Nottingham, UK. SMT maintain registration with the Information Commissioner's Office (ICO).

This notice explains how we collect and use personal data in our B2B commercial relationships (sales, licensing, support/services), website and online interactions (including cookies/analytics), events and marketing, supplier/partner management, collaborative research and development, and for visitors to our premises. For employees, contractors and candidates, see our Internal Privacy Notice.

Your privacy, and the security of your information is a responsibility that SMT takes seriously. We understand our responsibility to ensure that any personal data that we collect, store, use or otherwise handle, is processed in accordance with applicable data protection legislation.

THE TYPE OF PERSONAL DATA WE COLLECT

We collect only what we need to provide products and services, operate our business, protect our intellectual property, and ensure the safety and security of our premises.

We need to keep records of engagements with our business and website, as well as basic contact details to inform our interactions with customers, suppliers, and service partners.

Where personal data is required to enter into or perform a contract, administer an account, provide support, issue a licence, manage site access or meet a legal obligation, failure to provide it may mean that SMT cannot provide the relevant product, service, access or support. Information identified as optional does not have to be provided.

The personal data that we collect includes

(Note this list is non-exhaustive and is provided only for example)

Business contact details: name, job title, company, work email, phone, postal address.

Account/usage identifiers: usernames/hostnames, IP addresses, support logs, and information generated by our software and systems for licence validation and enforcement.

Marketing & events: communication preferences, registrations (e.g., webinars/events), and responses to surveys/market research.

Online identifiers: device/advertising identifiers and cookies (including Google Analytics cookies).

Site visitors: name, company, contact details, time of entry/exit, vehicle registration, photograph, and CCTV footage. We may also collect information about accessibility needs to ensure your safety.

This list is non-exhaustive and, where necessary and appropriate to our relationship with you, we may collect additional personal data from you, your organisation, or relevant third parties.

HOW WE GET THE PERSONAL DATA AND WHY WE HAVE IT

Most of the personal data that we process is provided to us directly by you via enquiries, trials, licensing, technical support, events and site visits. We also receive personal data indirectly from third parties including:

From your employer (for account administration or introductions).

From referring partners and other third parties who introduce you to us.

From website analytics (see "Cookies & analytics").

From visitor sign-in systems and CCTV when you attend our premises.

We use this data for the following purposes:

- **Fulfilment of services and commercial relationships**: processing enquiries and orders, licensing, delivering products and support, administering accounts, and managing projects (including R&D collaborations).
- **Protecting and enforcing our rights**: licence validation and enforcement; detecting, preventing and stopping copyright infringement.
- **Sales, marketing and events**: sending product updates, offers or content we believe is relevant; conducting surveys/market research; administering registrations. You can opt out at any time (see "Opting out").
- **Website operations and improvement**: understanding how visitors use our site to improve user experience (see "Cookies & analytics").
- **Site security and safety**: managing visitor access, maintaining a safe and secure environment, complying with health and safety law, and investigating incidents. Visitor data is used for sign-in, issuing badges, and (where applicable) CCTV monitoring.

THE LAWFUL BASES WE RELY ON FOR PROCESSING PERSONAL DATA ARE:

We rely on one or more of the following lawful bases, as appropriate to each activity:

(a) Your consent.

Only where requested for optional processing (e.g.: certain categories of cookies or specific forms of electronic marketing depending on jurisdiction). You may withdraw consent at any time using the mechanisms described in this notice.

(b) We have a contractual obligation.

To provide products and services, technical support and account management.

(c) We have a legal obligation.

E.g.: health & safety, regulatory requirements.

(d) We have a legitimate interest.

E.g.: B2B relationship management and direct marketing with appropriate balancing tests; product and service security; licence enforcement; internal record-keeping and service improvement; maintaining a safe and secure environment for site visitors.

(e) We have a vital interest.

It is unlikely that SMT will rely on the lawful basis relating to vital interests to process your personal data. SMT only relies on vital interest as a lawful basis where the sharing of information is necessary to protect someone's life, or to avoid significant harm to life, in an emergency.

Public tasks: SMT does not rely on the lawful basis relating to public tasks as we do not process personal data in the exercise of official authority or to perform public interest tasks set out in law.

Special category data: We do not routinely seek to collect special category personal data under this notice. Where such information is provided or becomes necessary, for example information concerning accessibility or health requirements associated with a visit to our premises, we process it only where an appropriate lawful basis under UK GDPR Article 6 and an additional condition under Article 9 applies. We restrict access to such information and apply appropriate safeguards.

WHERE NECESSARY AND APPROPRIATE, WE MAY SHARE THIS INFORMATION WITH:

We share data only where necessary and with appropriate safeguards. Typical recipients include:

IT and information security providers: e.g., Microsoft or outsourced IT and security incident response providers.

Sales, service and marketing platforms: Dynamics CRM, Zendesk, Eventbrite, Mailchimp.

Professional and insurance services: consultants and advisors, auditors, certification bodies, and insurers.

Legal and regulatory authorities: law enforcement, tax authorities, courts and regulators when required by law.

Corporate transactions: prospective buyers and their agents in the context of a business sale or reorganisation.

Site security providers: site security providers including CCTV monitoring services.

SMT and some of its service providers operate internationally. This may involve transferring personal data outside the UK or European Economic Area, including to countries that are not covered by a UK or EU adequacy decision.

Where required, SMT uses an appropriate transfer mechanism, such as the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or another safeguard permitted by applicable data protection law. Where a transfer is not based on an adequacy decision, SMT assesses the transfer risks and applies supplementary measures where necessary.

HOW WE STORE YOUR PERSONAL DATA

We apply appropriate technical and organisational security measures, including encryption where appropriate and secure disposal of data storage media in accordance with recognised industry standards. Physical records are securely destroyed.

Unless data must be deleted sooner, or a longer period is necessary for a specific legal, contractual, accounting, warranty, intellectual property, or dispute management purpose, physical and electronic records shall be retained for the following periods at the end of which they are securely disposed of or put beyond use.

Customer records: normally up to five (5) years after the business relationship ends.

Project related personal data: normally up to five (5) years after project completion.

Supplier and business partner contact records: normally three (3) years after the relationship ends.

Financial and tax records: retained for the applicable statutory period, normally six (6) years + current.

CCTV footage: normally 30 days, or up to 365 days following completion of an investigation where the footage is required as evidence.

Visitor sign in records: normally no longer than 12 months unless required for an investigation, legal claim, safety matter or other documented purpose.

Marketing suppression data: limited information may be retained after an opt-out so that SMT can continue to respect the individual's preference.

- All physical records containing personal data are disposed of by secure information disposal methods in line with applicable standards and regulations.
- All data storage media (hard drives / USB drives / disks etc.) are wiped, and factory reset prior to internal reuse of any associated device and are wiped to recognised industry standards, or permanently destroyed, prior to external recycling or sale of any associated device.
- Archived records clearly display the scheduled destruction date.

COOKIES & ANALYTICS

We use Google Analytics to understand website usage (e.g., which pages are of interest, which browsers are widely used). Google Analytics uses cookies—small text files placed on your device.

- Further information: https://www.google.com/analytics
- To opt out of Google Analytics across all websites: https://tools.google.com/dlpage/gaoptout

MARKETING

You can opt out of promotional emails at any time by clicking 'unsubscribe' in the email footer or by contacting privacy@smartmt.com. If an email does not include an unsubscribe link, reply to the message stating your wish to unsubscribe. For cookies, use your browser settings and the Google opt-out tool above.

LINKS TO OTHER WEBSITES

Our website or communications may include links to third-party sites. We do not control those sites and are not responsible for their privacy practices. Check the privacy statement for each site you visit.

DATA SUBJECT RIGHTS

Under data protection law, data subjects have rights including:

Your right of access – You have the right to ask us for copies of your personal data.
Your right to rectification – You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
Your right to erasure – You have the right to ask us to erase your personal data in certain circumstances.
Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal data in certain circumstances.
Your right to object to processing – You have the right to object to the processing of your personal data in certain circumstances.
Your right to data portability – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
Your rights in relation to automated decision-making and profiling – You have rights in relation to decisions based solely on automated processing, including profiling, where those decisions produce legal or similarly significant effects. SMT does not currently make decisions about individuals based solely on automated processing where those decisions produce legal or similarly significant effects. If this changes, we will provide appropriate information about the processing, its significance and the likely consequences.

The rights available to you depend on the circumstances and the lawful basis on which we process your personal data. Where processing is based on your consent, you have the right to withdraw that consent at any time.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at privacy@smartmt.com if you wish to exercise your data subject rights.

CHANGES TO THIS NOTICE

We may update this notice from time to time and will make the most recent version available on our website.

HOW TO COMPLAIN

If you have any concerns about our use of your personal data, you can make a complaint to us at:

Privacy Team, Smart Manufacturing Technology Ltd

1 Clifton Lane, Wilford

Nottingham, NG11 7AT

Email: privacy@smartmt.com

SMT takes your privacy seriously and invite you to raise any concerns to us directly in the first instance, to allow us the opportunity to advise, and where necessary, perform any relevant investigations.

You have the right to complain directly to the ICO if you have concerns with how we are processing your personal data.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk