

## PRIVACY POLICY

### 1. Introduction

- 1.1. METRIC Group Ltd is dedicated to safeguarding and preserving your privacy during our interactions with you and other parties to help achieve our goal of providing the highest quality products and services.
- 1.2. This privacy policy explains what happens to any personal data that you provide to us, or that we collect from you, in accordance with the General Data Protection regulation (GDPR).
- 1.3. METRIC Group Ltd commits to adhere to the fundamental principles of privacy and data protection. We therefore regularly review our privacy policy in order to keep it up to date and compliant with privacy and data protection principles. This privacy policy may be changed from time to time in order to keep pace with new developments and opportunities and to stay in line with prevailing legislation.

### 2. Information We Collect

- 2.1. We are committed to protecting the privacy of third parties we may interact with. We may collect and process the following data about you:
  - a. Information that you provide by filling in forms on our website, such as when you registered for information.
  - b. Information provided to us when you communicate with us for any reason.
  - c. Information provided to us when we communicate with you for any reason.
  - d. We do not collect any sensitive data about you.

### 3. How We Use Your Personal Data

- 3.1. In this Section we set out:
  - a. the general categories of personal data that we may process;
  - b. in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - c. the purposes for which we may process personal data; and
  - d. the legal bases of the processing.

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3.2. We may process data about your use of our website ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is provided by our analytical service Canddi. This usage data may be processed for the purposes of analysing the use of the website. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website.

3.3. We may process information contained in any enquiry you submit to us regarding products and services ("enquiry data"). The enquiry data may be processed for the purposes of offering and selling relevant products and services to you. The legal basis for this processing is based on the consent via the enquiry request and data provided.

3.4. We may process information relating to our customer and supplier relationships, including customer and supplier contact information ("relationship data"). The relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the relationship data is you or your employer. The relationship data may be processed for the purposes of managing our relationships with customers and suppliers, communicating with customers and suppliers, keeping records of those communications, promoting our products and services to customers and management of supply agreements. The legal basis for this processing is our legitimate interests, namely the proper management of our customer and supplier relationships.

#### 4. Provision of Personal Data

##### Is the provision of personal data statutory or contractual?

4.1. The provision of certain personal data is primarily contractual and, in some circumstances, required to meet legal and regulatory obligations. Personal data is required to:

- enter into and perform contracts with customers, suppliers, or business partners.
- process orders, manage accounts, and deliver goods and services.
- verify identity and prevent fraud; and
- comply with applicable legal, regulatory, accounting, and tax obligations.

##### What are the consequences of not providing personal data?

4.2. If you choose not to provide the personal data, we request:

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- we may be unable to enter into a contract with you.
- we may be unable to fulfil orders, supply goods, or provide services.
- we may be unable to conduct necessary verification, compliance, or fraud prevention checks; and
- as a result, our services may be delayed, restricted, or declined.

4.3. Where personal data is requested for optional purposes, such as marketing communications, providing this data is not mandatory, and you may withdraw your consent at any time without affecting your ability to receive goods or services from us.

**Non-Automated Decision Making and Profiling**

4.4. We may use automated systems and tools to support certain business processes, such as risk assessment, fraud prevention, affordability checks, identity verification, or record management.

4.5. These tools may analyse personal data using predefined criteria or rules to generate indicators, scores, or recommendations. However, we do not make decisions that have a legal or similarly significant effect on individuals based solely on automated processing. Any such decisions are subject to meaningful human review.

4.6. The use of these tools may influence the speed or level of review applied to an application or request, but individuals will not be subject to automatic rejection or adverse decisions without human involvement.

**5. Providing your personal data to others**

5.1. We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries, insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy. Information about our group of companies can be found at <http://www.tristarinc.com>

5.2. We may disclose name, address, email and telephone numbers to our suppliers or subcontractors, insofar as reasonably necessary for provision of products and services applicable to the enquiry.

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5.3. We may disclose your enquiry data to one or more third party suppliers of products goods and services for the purpose of enabling them to contact you so that they can offer and sell to you relevant products and services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

5.4. In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person or company.

## 6. Credit reference and affordability checks

To help us assess applications, prevent fraud, and meet our legal and regulatory obligations, we may obtain information about you from credit reference agencies (CRAs).

We obtain this information via **Creditsafe**, which uses its data partner **TransUnion** to supply consumer credit and identity data.

- **Creditsafe Business Solutions Limited** is authorised and regulated by the Financial Conduct Authority  
FCA Firm Reference Number: **742313**
- **TransUnion International UK Limited** is authorised and regulated by the Financial Conduct Authority  
FCA Firm Reference Number: **805757**

The information we receive may include data relating to your identity, credit commitments, payment history, and public record information. This data is used solely for legitimate business purposes, including creditworthiness assessment, identity verification, and fraud prevention, in accordance with applicable data protection laws. Further information about how Creditsafe and TransUnion process your personal data can be found in their respective privacy notices:

- **Creditsafe Privacy / Transparency Notice:**  
[Transparency Notice | Customers & Suppliers](#)
- **TransUnion CRAIN (Credit Reference Agency Information Notice):**  
<https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference>
- **TransUnion Bureau Privacy Notice:**  
<https://www.transunion.co.uk/legal/privacy-centre/pc-bureau>

## 7. International transfers of your personal data

7.1. In this Section, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

7.2. We and our other group companies and distributors have offices and facilities outside of the EEA. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of

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these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of the appropriate safeguards can be obtained by contacting [GDPR@metricgroup.co.uk](mailto:GDPR@metricgroup.co.uk)

7.3. The hosting facilities for our website are situated in the UK

7.4. You acknowledge that personal data that you submit for publication through our website may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## 8. Storing Your Personal Data

8.1. Data that is provided to us is stored on our secure servers and for backup purposes, data provided may be stored offsite in an encrypted format. Appropriate security measures are in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

8.2. The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk.

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

## 9. Retaining and deleting personal data

9.1. We will only retain your personal information 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. Details of data retention are available in the Data Retention Policy.

9.2. 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.

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9.3. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 10. Your rights

10.1. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. Your principal rights under data protection law are:

- the right to access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to complain to a supervisory authority; and

10.2. the right to withdraw consent.

10.3. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

10.4. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

10.5. In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

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- you withdraw consent to consent-based processing;
- you object to the processing under certain rules of applicable data protection law;
- the processing is for direct marketing purposes and the personal data has been unlawfully processed.

10.6. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation;
- for the establishment, exercise or defence of legal claims.

10.7. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- you contest the accuracy of the personal data;
- processing is unlawful but you oppose erasure;
- we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection.

10.8. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it:

- with your consent;
- for the establishment, exercise or defence of legal claims;
- for the protection of the rights of another natural or legal person;
- for reasons of important public interest.

10.9. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- the performance of a task carried out in the public interest or in the exercise of any official authority vested in us;

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- the purposes of the legitimate interests pursued by us or by a third party.

10.10. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

10.11. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

10.12. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

10.13. To the extent that the legal basis for our processing of your personal data is:

- consent; or
- that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means.

10.14. You have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

10.15. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

10.16. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

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10.17. You may exercise any of your rights in relation to your personal data by written notice to the address below or email to [GDPR@metricgroup.co.uk](mailto:GDPR@metricgroup.co.uk)

## 11. Use of Cookies

11.1. METRIC Group Ltd use cookies on our website, these cookies are not strictly necessary for the provision of our website. We will ask you to consent to our use of cookies when you first visit our website.

11.2. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

11.3. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

11.4. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 12. Cookies that we use

12.1. We use cookies for the following purposes:

12.1.1. authentication - we use cookies to identify you when you visit our website and as you navigate our website. Cookies used for this purpose are:

a. Canddi;

12.1.2. analysis - we use cookies to help us to analyse the use and performance of our website and services. Cookies used for this purpose are:

a. Infinity Call Tracking

b. LinkedIn

c. Google Analytics

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d. Google Tag Manager

12.1.3. cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally. Cookies used for this purpose are:

a. Cookie Consent

**13. Cookies used by our service providers**

13.1. Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

13.2. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>

**14. Managing cookies**

14.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via the browser's company website.

14.2. Blocking all cookies will have a negative impact upon the usability of many websites.

14.3. If you block cookies you will not be able to use all the features on our website.

**Social Networks**

14.4. Our website and (mobile) applications provide you with social plug-ins from various social networks. If you choose to interact with a social network, your activity on our website or (mobile) applications will also be made available to social networks such as Facebook and Twitter.

14.5. If you have logged in to one of these social network sites during your visit to one of our websites or (mobile) applications, the social network site may add this information to your profile. If you are interacting with one of the social plug-ins, this information will be transferred to the social network site. If you do not want this data transfer, please log out of your social network site before entering one of our websites or (mobile) applications. We cannot prevent this data collection and social plug-in information transfer. Please read carefully the privacy policies of your social

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networks for detailed information about their collection and transfer of personal data, your rights, and how you can achieve satisfactory privacy settings.

14.6. Additionally, to improve your user and brand experience, your data may be passed to a third party (e.g. Facebook) for processing in accordance with data protection and privacy regulations.

### 15. Third Party Links

15.1. You might find links to third party websites on our website. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their content or policies whatsoever as we have no control over them.

### 16. Our details

16.1. Should you have any questions about our privacy policy or the processing of your personal data, please feel free to contact us.

16.2. We are registered in England under registration number 2560839, and our registered office is at Metric House, Westmead Industrial Estate, Swindon, Wiltshire, SN5 7AD, England.

16.3. Our principal place of business is at the above address.

16.4. You can contact our Data Protection Officer:

- James Palmer, [j.palmer@metricgroup.co.uk](mailto:j.palmer@metricgroup.co.uk)
- by email to [gdpr@metricgroup.co.uk](mailto:gdpr@metricgroup.co.uk)
- by post, to the postal address given above;
- using our website contact form [www.metricgroup.co.uk](http://www.metricgroup.co.uk);
- by telephone, on the contact number published on our website [www.metricgroup.co.uk](http://www.metricgroup.co.uk) ;

16.5. Our website is owned and operated by Metric Group Limited.

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