

1. Scope

1.1. This Privacy Notice informs users about the nature, extent, and purpose of the collection and use of personal data by Colt Group Limited and Colt International Limited (“Colt” or the “Company”). This Privacy Notice governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information.

2. Handling of personal data

2.1. Personal data is information that allows for a person to be identified, i.e. information that can be traced back to the individual. This includes a person’s name, e-mail address, or telephone number. Personal data could also include preferences, hobbies, memberships, or websites visited.

2.2. We will only collect, use, or pass on personal data if there is a lawful purpose or the individual has agreed to the data collection.

3. Compliance with Our Privacy Policy

3.1. We use the information we collect only in compliance with this Privacy Notice.

4. We Never Sell Personal Information

4.1. We do not sell customer’s personal data to third parties and will only use your personal information to fulfil our contract or provide you with details of our own products and services which we believe will be of interest to you.

5. What information do we collect?

5.1. This privacy notice tells you what to expect when the Colt collects personal information.

5.2. It applies to information we collect about:

- visitors to our websites;
- people who complete a contact form;
- people who use our web services, e.g. who subscribe to our newsletter and blog or request a publication from us;
- contact us by telephone, email, SMS, letter or any other form of messaging;
- if you request information from us with a view to entering into a transaction with us;
- whenever you enter into any transaction with us;
- people who notify under the General Data Protection Regulations.

5.3. In addition to the uses identified elsewhere in this Privacy Notice, we will use your Personal Information to: (a) improve your browsing experience by personalising the website; (b) contact you. If you have indicated a specific interest in a product or service (c) send you marketing communications relating to your prior requests which we think are of legitimate interest to you. If you have contacted us for a specific purpose or accessed our services by completing a website form, we’ll take into account your perceived preferences for a specific product or service. In the event that you do not wish to receive this personalised service, you can unsubscribe from our emails or similarly contact us as set out in.

5.4. We may contact you:

- For legitimate purposes aligned with our contract;
- In relation to a previous communication from you. This includes any comment or complaint concerning us, our services, products, or any previous contact we may have had with you;
- If you requested further information or signed up to a product, newsletter, white paper or webinar;
- If you have expressed an interest in a specific product, property or development;
- To provide you with additional information concerning a specific project, product or service or similar project, product or service to those in which you have expressed an interest;
- For marketing purposes if you have chosen to receive a service from us by completing one of our website forms.

6. Visitors to our websites

- 6.1. Colt may collect two types of information: personal (name, email address, company information) or non-personal visitor information (such as: the Device's Internet Protocol ("IP") address, browser type, the web page visited before or after you came to our website, information you search for on our website and interactions with the Service).
- 6.2. You may visit our Website anonymously. You may be asked to enter your email address on the Website in order to download a material, or to ask a question about our products using a live chat installed on the Website.
- 6.3. When subscribing to our blog or newsletters, you will be asked to enter your first name, last name, email address and Company name.
- 6.4. When someone visits www.coltinfo.uk we use a third party service, Google Analytics, to collect standard internet log information such as browser and operating systems you are using the access our website. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.
- 6.5. Our Websites provide links to other websites. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Notice does not apply to these other websites, which are subject to any privacy and other policies they may have.

7. Use of cookies

- 7.1. Some of our web pages use cookies. Cookies do not harm your computer and do not contain any viruses. Cookies help make our website more user-friendly, efficient, and secure. Cookies are small text files that are stored on your computer and saved by your browser.

- 7.2. Most of the cookies we use are so-called "session cookies." They are automatically deleted after your visit. Other cookies remain in your device's memory until you delete them. These cookies make it possible to recognise your browser when you next visit the site.
- 7.3. You can configure your browser to inform you about the use of cookies so that you can decide on a case-by-case basis whether to accept or reject a cookie. Alternatively, your browser can be configured to automatically accept cookies under certain conditions or to always reject them, or to automatically delete cookies when closing your browser. Disabling cookies may limit the functionality of this website.
- 7.4. Cookies which are necessary to allow electronic communications or to provide certain functions you wish to use are stored in accordance with applicable laws. The Website Operator has a legitimate interest in the storage of cookies to ensure an optimised service provided free of technical errors. If other cookies (such as those used to analyse your surfing behaviour) are also stored, they will be treated separately in this privacy policy.

8. Search engine

- 8.1. Our website search is powered by Google. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either Colt or any third party.

9. Security and performance

- 9.1. The Company uses a third party service to help maintain the security and performance of the Colt Group (and subsidiary) website. To deliver this service it processes the IP addresses of visitors to the website.

10. Hubspot & Contao

- 10.1. We use a third party service, HubSpot & Contao, to publish our blog, and some of our conference microsites. These sites are hosted at HubSpot & Contao. We use a standard Contao service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. HubSpot requires visitors that want to post a comment to enter a name and email address. For more information about how HubSpot processes data, please see HubSpot's privacy notice.

11. People who contact us via social media

- 11.1. We directly manage our social media interactions. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them e.g. LinkedIn, Facebook or Twitter.
- 11.2. If you send us a private or direct message via social media the message will be not stored. It will not be shared with any other organisations.

12. People who email us

- 12.1. We use IronPort (AntiSpam/Antivirus SMTP Gateway) to encrypt and protect email traffic. If your email service uses Transport Layer Security (TLS) for receiving/sending mails then

Ironport will use an encrypted connection. You should be aware that any emails we send or receive may not be protected in transit as we do not offer end to end encryption.

- 12.2. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

13. People who use our LiveChat service

- 13.1. We use a third party provider Zendesk, to supply and support our LiveChat service, which we use to handle customer enquiries in real time.
- 13.2. If you use the LiveChat service we will collect your name, email address (optional) and the contents of your LiveChat session. This information will be retained for two years and will not be shared with any other organisations.
- 13.3. You can request a transcript of your LiveChat session if you provide your email address at the start of your session or when prompted at the end.

14. Our suppliers and subcontractors

- 14.1. Information supplied for consideration and maintenance of our approved supplier list is retained on our secure network, which has limited access internally and no access externally. Information provided by you is held in a secure environment, retained for 6 years and disclosed on a need to know basis in accordance with GDPR. Should there be no invoice activity within a 6 year timeframe, your details will be archived.
- 14.2. If you no longer wish for us to retain your information, please email dpo@uk.coltgroup.com to confirm you wish to be deleted from our records.

15. People who make a complaint to us

- 15.1. When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.
- 15.2. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.
- 15.3. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.
- 15.4. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

16. Complaints or queries

- 16.1. The Company tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of

information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

16.2. If a person asks us to stop contacting them, at Colt International we will always respect that request and stop further contact immediately.

16.3. Complaints can be sent to the Data Protection Officer at Colt at dpo@uk.coltgroup.com or the addresses below.

16.4. You can also contact the regulator should you feel we have not adequately addressed your concerns. <https://ico.org.uk/concerns/>

17. Security of your Personal Information

17.1. We use a variety of security technologies and procedures to help protect your Personal Information from unauthorised access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure.

18. Retention of Personal Information

18.1. We retain Personal Information that you provide us as long as we consider it potentially useful in contacting you about our services, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements, and then we securely delete the information. We will delete this information from the servers at an earlier date if you so request, as described in "Opting Out and Unsubscribing" below.

19. Reviewing, Correcting and Removing Your Personal Information

19.1. Under the General Data Protection Regulations (GDPR), you have rights as an individual which you can exercise in relation to the information we hold about you.

19.2. Colt International tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the GDPR. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

19.3. To make a request for any personal information we may hold you need to put the request in by email or writing to the addresses provided below.

19.4. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

19.5. If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the DPO.

20. Compelled Disclosure

20.1. We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

21. Changes to this privacy notice

21.1. This privacy notice will be reviewed by the Senior Management Team on a regular basis (at least annually) and may be amended from time to time.

22. How to contact us

If you want to request information about our privacy notice you can email us or write to:

James Liddiard
Legal & Commercial Director
Colt Group Limited
12 Waterberry Drive,
Waterlooville,
Hampshire
PO7
james.liddiard@coltgroup.com

Data Protection Officer
Colt International Limited
Colt House,
Ridgeway Office Park,
Bedford Road,
Petersfield ,
GU32 3QF
dpo@uk.coltgroup.com