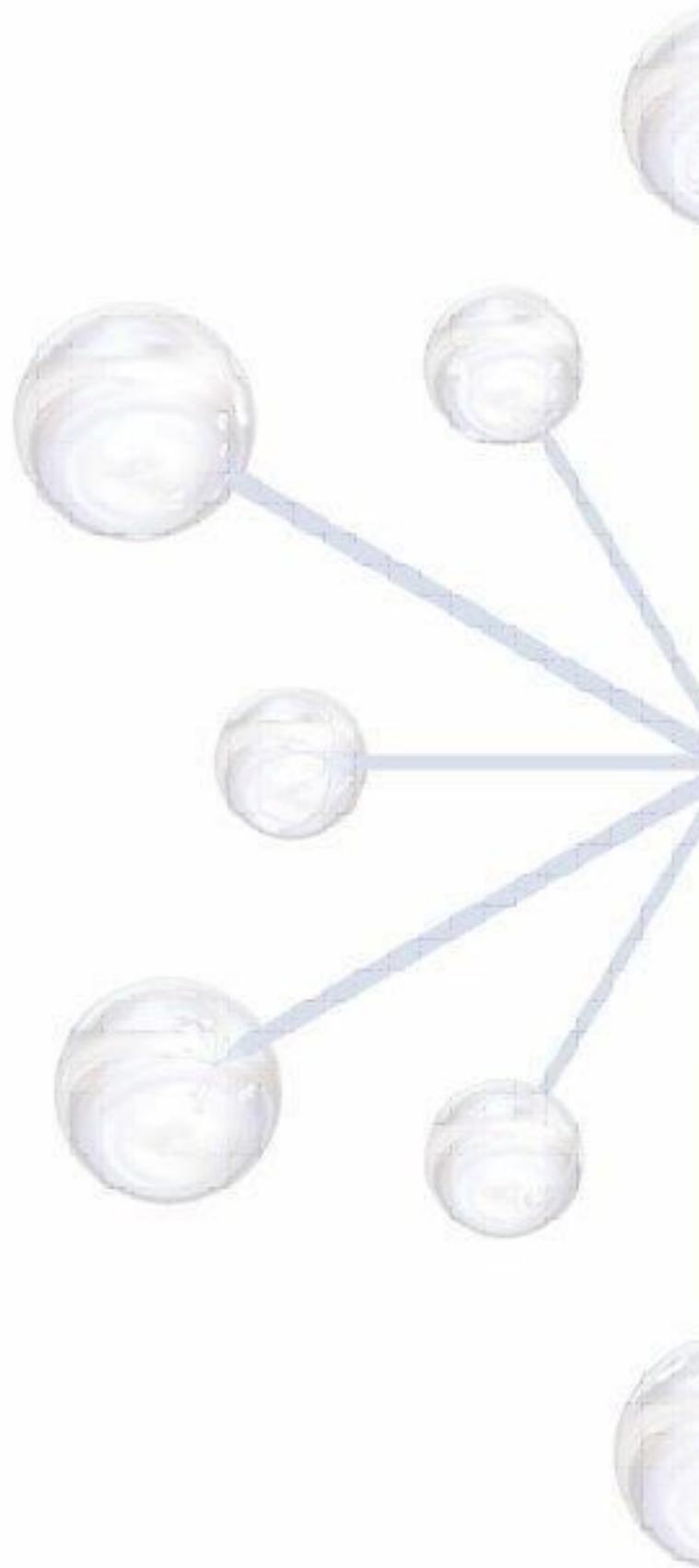


Metalogic Privacy Policy



The Metals Industry
Information and
Communication
Technology Company



About Us

Metalogic are one of the world's leading suppliers of integrated IT Systems to the Metals Stockholding, Service Centre and Processing Industries. The registered office is Metalogic Ltd, Hithercoft Road, Wallingford, Oxon, OX10 9BT,

We are not required to appoint a formal data protection officer under data protection law. However we have appointed a Data Protection contact.

Contacting Us

If you have any questions about our Privacy Policy or your information, or to exercise any of your rights as described in this Privacy Policy or under data protection laws you can contact our Data Protection Contact Andy Jackson.

Email	andyj@metalogicLtd.co.uk
Telephone	0) 844 257 1108
By Post	Metalogic Ltd, Hithercoft Road, Wallingford, Oxon, OX10 9BT,

This Document

As part of the Jonas Family of Companies we are committed to protecting your privacy. This document is a statement that discloses how Metalogic gathers, uses, discloses, and manages personal data as part of its business day to day operation. Our privacy policy explains :

- What information we collect, and why we collect it
- How we use that information
- How we protect that information
- How you can control your information including accessing, updating and deleting what we store
- How and if we share information collected

Personal Data Processed by Metalogic

Metalogic does not process personal data from its customers and suppliers. Personal data held by Metalogic is limited to contact information for sales, purchasing and marketing purposes only.

Information Collected and Stored For Customer, Prospects and Suppliers

The categories of personal data that we hold when collected are as follows:

- First and last name
- Job title and company name
- Email address
- Phone Number
- Personal or professional interests

The data is contact data and consent will be requested by email and the link to the Privacy Policy will be provided.

Collection and Use of Employee Personal Information

We also collect personal information from our employees and from job applications (human resource data) in connection with administration of our human resources program and functions. These programs and functions include, but are not limited to: Job application, hiring programs, compensation and benefit programs, performance appraisals, training access access to our facilities and computer networks, employee profiles, employee directories, human resource recordkeeping and other employment related purposes. It is our policy to keep all past and present employee information private from disclosure to third parties. There are certain business relate exception. This is a summary of personal information stored and is is covered in detail as part of the Jonas HR Privacy Policy.

Data Held

Type of Data	Purpose	Retention Period
Supplier Contacts	Purchasing Process	Valid for the life of a contract
Prospect Contacts	Sales and Marketing Process	As long as consent valid
Customer Contacts	Technical Support and Product Updates	Valid for the life of a contract

How we use information

As a data processor we will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which carry out each type of processing is explained in the table below.

Purposes for Which We will process the data	Type of Data	Legal Basis
To provide you with information and materials that you request from us	a) Identity b) Contact	It is in our legitimates interests to respond to your queries and provide any information or materials requested in order to generate and develop business. To ensure we offer an efficient service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
To personalise our services and products and the sites to you	a) Identity b) Contact c) Technical	It is in our legitimate interests to improve the website in order to enhance your experience on our site. To facilitate our services we consider this use to be proportionate and will not be prejudicial or detrimental to you.

To update you on services and products and benefits we offer	a) Identity b) Contact	<p>It is in our legitimated interests to improve the website in order to enhance your experience on our site. To facilitate our services we consider this use to be proportionate and will not be prejudicial or detrimental to you.</p> <p>If you would prefer not to receive any direct marketing communication from us you can opt out at any time by contacting us as detailed in “Contacting Us” above</p> <p>For direct marketing sent by email to new contacted (i.e individuals who we have not previously engaged with) we need your consent to continue send unsolicited direct marketing.</p>
To send you information regarding changes to our policies other terms and condition and other administrative information	a) Identity b) Contact	It is in our legitimate interest to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you
To enforce the terms and condition and any contracts entered with you	a) Identity b) Contact	It is in our legitimate interest to enforce our terms and condition of service. We consider this use to be necessary for our legitimate interests and proportionate

Data Sharing

Metalogic does not share any personal data with any organisation, other than to satisfy statutory obligations such as sharing payroll data with HMRC. Data is only used by Metalogic personnel.

Processors

Metalogic use of processors of personal data is restricted to the hosting of customer data where cloud hosting solutions are implemented. These systems are only implemented with organisations that comply with stringent data privacy requirements and comply with the provisions of the General Data Protection Regulation.

Processor	Domicile	Purpose
Rackspace	UK	Hosting data
Jonas HR	UK	Personnel data

Profiling and Automated Decision Making

Metalogic does not perform any profiling of personal data nor does it perform any automated decision making.

International Transfers

Metalogic does not transfer any personal data outside of the United Kingdom.

Secure Storage of Data

All personal data are stored in secure UK data centres operated by organisations with ISO 27001 certification.

Support Processes Impacting on Data

As part of the support processes and services offered by Metalogic there are times that Metalogic may have to copy data back to Metalogic servers in order to debug or resolve software issues. No data will be copied without the authorisation of the customer which will be requested by email. The copied data will be removed from Metalogic servers on the completion of the support fix and this will be confirmed by Metalogic.

As part of the support procedures and processes there is potential for Metalogic support personnel to view personal data. This data will not be amended, altered, copied or used in anyway by Metalogic personal as defined by the Metalogic Personnel Confidentiality agreement in the employee contract.

Further details regarding the impact of personal and customer data as part of the support process can be see on website from the customer section.

Data Retention: How Long We Keep Your Personal Data

When you contact us, we may keep a record of your communication to help solve any issues that you might be facing. Your information may be retained for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirement.

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.

For personnel data related to prospects and clients personal data is stored until consent is withdrawn or seven years from termination of contract.

Your Rights

Subject to certain limitation, you have rights under data protection laws in relation to your personal data. These rights include the rights to:

Request access to your personal data	This enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it. Note that we may refuse to comply with a request for access if the request is manifestly unfounded or excessive or repetitive in nature
Request correction of your personal data	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. Note that we may refuse to comply with a request for correction if the request is manifestly unfounded or excessive, or repetitive in nature.
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 that we may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims.
Request restriction of processing 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. Note that we may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive, or repetitive in nature. nal data
Request transfer of your personal data	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 where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.
Right to withdraw consent	You can withdraw your 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.
Right to object to direct marketing	<i>Direct marketing</i>

	<p>You 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.</p> <p>Where we process your information based on our legitimate interests.</p> <p>You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.</p>
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If you wish to exercise any of the rights set out above, including withdrawing consent, please contact us giving us specific details regarding which right you choose to exercise.

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.

Please direct any questions about your information to the Data Protection Contact identified above.

Use of Cookies, IP Addresses From Our Website

Cookies

In order to improve our website, we may use small files known commonly as “cookies”. Cookies are technology that can be used to help personalise your use of a website. A cookie is a small amount of data which often include a unique identifier that is sent to your computer or mobile phone (your “device”) from the sites and is stored on devices browser or hard drive. The cookies we use on the site won't collect personally identifiable information about you and we won't disclose information stored in cookies that we place on your device to third parties.

To enable us to assess the effectiveness and usefulness of this site and to give you the best user experience, we collect and store information such as pages viewed by you and your domain name and similar information. Our site makes use of anonymous cookies for the purposes of :

- Completion and support of site activity
- Site and system administration
- Research and development
- Anonymous user analysis, user profiling and decision making

By continuing to browse the site you are agreeing to our use of cookies.

If you don't want to use cookies when you use the website, you can set your browser to notify when you receive a cookie, giving you the chance to decide whether to accept it or decline at any time. However if you block cookies some of the features on the site may not function as a result.

IP Addresses and Aggregate Information

Aggregate information is used to measure the visitors' interest in, and use of, various areas of the Site and the various programs that we administer. We will rely upon aggregate information, which is information that does not identify you, such as statistical and navigational information. With this aggregate information, we may undertake statistical and other summary analyses of the visitors' behaviors and characteristics. Although we may share this aggregate information with third parties, none of this information will allow anyone to identify you, or to determine anything else personal about you.

Links

The website from time to time, contain links to and from the websites of our business partners, advertisers and affiliates. If you follow a link to any of these websites, please notes that these websites have their own privacy policies and do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

Social Media and Online Engagement

We occasionally use a variety of new technologies and social media options to communicate and interact with customers, potential customers, employees and potential employees. These sites and applications include popular social networking and media sites, open source software communities and more. To better engage the public in ongoing dialog, certain of our businesses use certain third-party platforms including, but not limited to, Facebook, Twitter and LinkedIn. Third-Party Websites and Applications (TPWA) are Web-based technologies that are not exclusively operated or controlled by us. When interacting on those websites, you may reveal certain personal information to us or to third parties. Other than when used by our employees for the purpose of responding to a specific message or request, we will not use, share, or retain your personal information.

- The Facebook privacy policy is available at: <http://www.facebook.com/policy.php>
- The Twitter privacy policy is available at: <http://twitter.com/privacy>
- The LinkedIn privacy policy is available at:
http://www.linkedin.com/static?key=privacy_policy

Your right to lodge a complaint with a supervisory authority

For the UK: You have the right to make a complaint at any time with a supervisory authority, in particular in the EU (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred.

The supervisory authority in the UK is the Information Commissioner who may be contacted at:

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

Tel: 0303 123 1113

Concerns and complaints can also be reported by their website

[//ico.org.uk/](http://ico.org.uk/)

If we receive formal written complaints, we will follow up with the person making the complaint. We work with the appropriate regulatory authorities to resolve any complaints that cannot be resolved directly. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.