

Alexander Fraser & Son Trading Ltd. T/A Frasers Aerospace PRIVACY POLICY – (v.1.0.2018)

This privacy policy sets out how Alexander Fraser & Son Trading Ltd – aka Frasers Aerospace – uses and protects any information that you give us when you purchase goods via email, phone or our website.

Frasers Aerospace is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when purchasing our goods by the means above, then you can be assured that it will only be used in accordance with that purchase and this privacy statement.

Frasers Aerospace may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 01/05/2018.

Who is Responsible for Processing Your Personal Data

Alexander Fraser & Son Trading Ltd trading as Frasers Aerospace has appointed Bryan Ribbans as their Data Governance Controller. This is the legal entity responsible for how your personal data is collected, stored and processed.

Alexander Fraser & Son Trading Ltd trading as Frasers Aerospace operates a number of different product brands and material supplies to which this privacy policy relates. These brands are all featured on our website under the heading 'Products' which will be updated from time-to-time as new products are added.

What we collect

We may collect the following information:

- Your name.
- Contact information including email address, telephone number(s) and address including postcode.
- Demographic information such as preferences and interests.
- Other information relevant to our products and your requirements.

Managing Your Personal Data

When you share your personal information with us, you have a right to expect that information to be treated with total confidentiality. Therefore, it is our responsibility to manage your personal data that you provide to us with care and in accordance with all data protection legislation and industry best practice.

Whether you have supplied your personal details online, by phone, by email or in a letter, we will never use them without a lawful reason to do so. We will use your personal data for the purposes for which they were initially requested and as fully explained in this Privacy Policy.

It is your responsibility to ensure that your personal data provided to us is accurate and up to date. You can update your personal contact details, including email address and phone number, by visiting our website and amending your personal profile or, if you need to update any other personal details, by ringing and speaking to our Customer Services on 020 8597 8781.

Using Your Personal Data for Direct Marketing Purposes

We do not operate Direct Marketing programs either from the website online, by phone, by email or in a letter. Based on our knowledge of your product application preferences, we may wish to advise you of details of our latest product(s) and contact you directly from time-to-time if we consider a new product to be of particular interest to you to improve your business operation(s) by phone or email to advise you of its existence, but no more.

Also, you may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes.
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to the Data Governance Controller and emailing us at contact@frasersaerospace.com

Obtaining Your Consent

We will obtain your consent to send you details of our latest products and/or special offers by email or phone contact in a number of ways. We will obtain your consent when you register your details with us, open a sales account, make a purchase, request a brochure/catalogue/Technical Data Sheet from us, or for product delivery purposes. You can change your email preferences at any time by adjusting your personal profile online or contacting the Customer Services by phone on 020 8597 8781 or email on: contact@frasersaerospace.com.

What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping of your purchases and enquiries.
- Internal record keeping forming the details of your personal or business on-going account(s) held to routinely service your account as orders are placed with us.
- We may use some of the information to improve our products and services.
- We may periodically send emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes in association with our Quality Management accreditations for customer satisfaction purposes. We may contact you by email, phone, fax or mail. We may use the resultant information to customise the website to suit your interests or particular requirements.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Using Your Personal Data to Open Your Personal Cash Account

When you register to open a personal account, we will hold your personal data which you have provided to us. When you make a subsequent card payment to purchase products from us, we will use your personal data and card information to process the order. This involves sending your personal data to our card payment and banking providers to process the financial payment for the order. Without this data, we are unable to fulfil your order.

We will hold your personal order data for 6 years, plus the current financial year, after the date of your last transaction on your personal account.

We do not hold or retain your personal transaction data including credit card details subsequent to the transaction being completed at the time.

Processing Card Payments

We process all card payments in line with our obligations for the orders which are placed. Whenever you provide your card details to us, if via the website online we will email you a transaction link for you to complete your order payment using the secure STRIPE payment program when we receive your order acknowledgement. If you pay over the phone to one of our sales staff, we may well write the details down however at the end of the transaction this paperwork is entered into a secure, non-retrievable waste disposal bin for destruction once collected by a secure waste contractor under contract.

Using Your Personal Data to Operate Your Personal Account

We will use your personal data to administer and to operate your personal account as set out below. We will collect and use the contact details that you provide to us to communicate with you about your account and in relation to the products and services we provide to you.

We will hold your personal data for 6 years, plus the current financial year, after the date of your last transaction on your personal credit and cash account.

Delivering Your Goods

We will use your personal contact details such as name, postal address, phone number and email address that you provide to us in respect of delivering products or services to you. We will share this information with our warehouse staff who directly pick, pack and despatch orders to you and our delivery logistics suppliers who in the course of their duties may contact you to arrange a convenient delivery time and provide you with updates as to when they will arrive.

Processing Returns and Refunds

We use your customer account and contact details to verify any returns and refunds that we process either by card or via your account.

Operating Your Account

We use your personal contact details such as name, postal address, phone number and email address to notify you about any updates, changes or issues with your personal account. We may use your personal contact data, payment history and other information obtained to determine if to offer or whether and when to increase or reduce your credit limit. We may also send you notifications via email if you have exceeded your credit limit or a payment is due.

Making Payments to Your Account

To make order payments, we will require a bank account number, sort code and the type of payment you wish to make e.g. full amount. We will use the personal data provided to verify that the account number and sort code combination are valid. We will also ask you for the bank account holder's name which the bank and other bodies eg; STRIPE/Jotform will use to verify the payment request. It is your responsibility to ensure that you either have a sole authority or that you have the bank account holder's permission to make payments from their bank account.

We do not accept payment by cheque.

Where you pay by credit or debit cards, we process all card payments through our secure STRIPE/Jotform payment program.

Electronic Statements & Other Documents via Email

We will use the email address that you provide to us to communicate with you about your account and in relation to the products and services we provide to you. Unless you have specifically requested otherwise, we will send your account statements and other account information and documentation to you electronically using your email address.

We will hold your statement data for 6 years, plus the current financial year, after the date of your last statement.

Call Recordings

We do not record any calls into our sales office nor anywhere else within our facilities.

Enquiries and Complaints

If you have any complaints with regards to the operation of your personal account, please contact our Data Controller – Bryan Ribbans on 020 8597 8781 or email on: contact@frasersaerospace.com so we can deal with your complaint as quickly as possible. We will need to access your personal data and account history to verify your identity for security reasons and deal with the details of your complaint. Details of any complaints received will be logged and recorded so they can be dealt with accordingly.

General Service Communications

We will use your personal data for all general customer service communications including sending your statements, processing orders, notifying you of orders received, updating you on deliveries, despatched or products out of stock. We need to do this for the performance of the service that you have requested of us by placing your order.

Using Your Personal Data to Improve Our Services

As a valued customer, we may use your personal data to contact you by phone or email to ask you to discuss with one of our sales service staff regarding previous or current purchase experiences with our company. We will always make you aware of how we will use the information that we gather from you at the time of contacting you for any specific product or customer service improvement programme. We have a legitimate business interest in contacting our customers in this way and will always treat your involvement in any service improvement programme, and associated personal data, in confidence.

Should you not wish to participate in our service improvement programme, you can simply decline to participate at the point of contact or, should you wish never to be contacted for the purpose of market research, you can tell us at any time by calling the Customer Services on 020 8597 8781.

Product Reviews

When you make a purchase from us, we may send you an email or call you asking you to provide your thoughts and review of the product(s) and tell us what you think. We may ask you to trial a new product(s) that we think you will like. If you choose to do so, we would be keen to hear what you think about our product(s) and use the information to inform our product development team.

Feedback

We use a Feedback tool to communicate with our customers to obtain feedback about our products and services which is located on our website pages in a distinctive yellow box. This information is only used by us to improve our product and service offering and deal with any Enquiries and Complaints that you raise via Feedback. Should you not wish to participate, you can choose not to respond.

Surveys

From time to time, we may contact you to take part in a customer satisfaction survey under the obligations we are required and requested to undertake within our certification to our ISO 9001:2015 Quality Management System. This will only be carried out by company staff members and not third-parties. We may sometimes follow up on these surveys with you to get more information from you regarding specific feedback. You can choose not to participate in such surveys should you not wish for your personal data to be shared in this way by ringing Customer Services on 020 8597 8781 or by email on: contact@frasersaerospace.com.

Social Media

We actively use social media platforms as a way of connecting, and getting closer, to our customers to hear and understand what our customers think about us and our products and services. Occasionally, we may contact you directly via those social media platforms if we would like to share your comments or pictures with other customers or publish them in our marketing materials. We will always ask you if you are happy for us to use your data in this way and will keep any data that you provide to us, such as email address, confidential and secure.

Using Your Personal Data to Process Insurance Claims

In the event that you need to make a claim against us or one of our Suppliers who we distribute on behalf, whether that be a product issue or personal injury claim, we will use your personal data and any supporting evidence that you provide to us to process your claim, including sharing this with our chosen insurance companies. From time to time where a claim is outside of our insurance policy, we may also need to engage with external lawyers and share your personal data with them.

Processing Your Personal Data Outside of the EU

In rare cases, we may have to advise transfer your personal data outside the European Economic Area (the EEA) to advise a non-EU manufacturer of an issue with either a

product or service that only they can answer, or it makes common sense to involve them in any decision making on your behalf.

In some cases, countries outside the EEA may not have such well-developed data protection laws as those in the EEA. However, we will put in place measures and safeguards that require your personal data to be kept secure, confidential and to be processed only and strictly in line with the terms of this Privacy Policy and any relevant data protection laws by our manufacturing supplying partners.

Acting as a Data Processor for Our Marketplace

We do not, and will not, provide/divulge/discuss/render any indication any data information to any external marketplace entity except, and only if or until, we are required so to do by a lawfully engaged entity and only then after advising you of said request(s) received.

How to Contact Us

If you have any questions, comments or complaints about this Privacy Policy or our use of your personal data, please contact us at:

Attn: Bryan Ribbans – Data Governance Controller

Frasers Aerospace

1 St James Road

Brentwood

Essex

CM14 4LH

Tel: 020 8597 8781

If you are at all dissatisfied with the information provided by the Data Governance Team, please address any complaints to Mr. Ian Wilson at the same address.

Your Personal Data Rights Right of Access

You may wish to access a copy of the personal data we hold about you – known as a Subject Access Request. You can do so by ringing, writing to or emailing the Data Governance Controller. We will respond to your Subject Access Request as soon as possible and, in any event, within the statutory 30 days. However, in the event that we need more information from you to verify your identity, which we must do to ensure we disclose your personal data to the right person, the 30-day response period will only commence from the time that we have validated your identity.

Please be aware that for security reasons we do not usually provide details of any bank details that we hold against your account(s). Please speak to our Data Governance Controller should you need this additional information.

Right of Rectification

If you believe we have made an error as to the personal data we hold about you, please speak to one of our customer service advisors on 020 8597 8781 who will be able to process the correction for you. Alternatively, you can visit your profile on the website to update your contact details online. Should you wish to discuss this matter further, please contact the Data Governance Controller.

Right of Erasure

You have the right to request your personal data to be permanently deleted from our records and systems to avoid any further communication with you. Your request will always be considered in light of the legal bases that we hold, store and process your personal data and the purpose that we collected your data. Where the legal bases permits, we will carry out your instruction without undue delay. Please note, however, that where we have a legal or contractual obligation to hold your personal data, we may not be able to carry out your request but we will explain this fully to you. In any case, should the request be carried out in full you will not be able to place orders for products or services unless and until this data was replaced or renewed. Please address any request to delete your data to the Data Governance Controller.

Right to Restrict Processing

Should you believe that we are processing your personal data in a way that you did not understand or agree to and wish to restrict such processing, please speak to the Data Governance Controller who will be pleased to assist you.

Right to Object to Processing

You have the right to object to certain types of processing of your personal data. We will always make it clear at the outset of any arrangement with you how we are going to process your personal data. Should you wish to object to such processing we will give you the option to opt out of any sale or service. However, should you wish to discuss this matter further, please speak to the Data Governance Controller.

Right to Portability

In the event that you wish to move your personal data that we hold on you to another organisation in the form of an excel or csv format, please contact the Data Governance Controller who will be able to assist you.

Right to be Informed

You have the right to be informed about the collection and use of your personal data. This is commonly known as a the 'Privacy Policy'. We will provide you with the information about how we collect and use your data via this Privacy Policy and subsequent revisions, all to be found online. Our Privacy Policy is regularly reviewed in line with our business processes. Any significant changes to this Privacy Policy may also be communicated via email. You can ask for a printed copy of our Privacy Policy by contacting the Data Governance Controller.

Right to Complain to the Information Commissioner's Office (ICO)

You have a right to lodge a complaint with the Information Commissioner's Office (ICO) if you have a complaint with how you believe your personal data has been handled.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.