

PRIVACY POLICY SMT GB

Latest update 3/03/2021 – Downloadable document

The present document constitutes the privacy policy (the “**Privacy Policy**”) of Services Machinery & Trucks Ltd, with registered office at Moorfield Road, Duxford, CB22 4QX, Cambridge, England and company number 10822984 (hereafter “**SMT**”).

SMT may collect your personal information during your visit to the website <https://smt.network/gb/> (the “**Website**”), operated by SMT. This Privacy Policy informs you as visitor of this Website about how SMT processes the personal data collected or communicated by you via the Website or spontaneously (e.g. via e-mail). This Privacy Policy also features information about the purposes SMT is trying to serve when processing details relating to this website, about the use of cookies and about how you can exercise any rights concerning your personal data. SMT will only use this personal data for the purposes described in this Privacy Policy and will do everything to protect all collected personal data.

1. Generalities

1.1. SMT is the controller of the personal data mentioned above and looks after the respect of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of the personal data and on the free movement of such data (United Kingdom General Data Protection Regulation) (the “**UK-GDPR**”) or of any other laws related to the protection of personal data, in particular related to confidentiality and security of these data.

1.2. The Website may contain links to other websites. This Privacy Policy is only applicable for this Website. If you visit other websites, SMT recommends you to read the privacy policy of the other websites.

1.3. SMT reserves the right to adapt this Privacy Policy at any time, the date of the most recent update being indicated at the beginning of this Privacy Policy. You shall regularly consult the applicable Privacy Policy at the moment you visit the Website.

1.4. SMT has implemented organizational and technological security measures to prevent personal data from being lost, misused, destroyed or inadvertently changed. All employees of SMT must comply with the security regulations that apply to the entire organization. Personal information is only accessible to authorized SMT employees, and these employees are required to guarantee the confidentiality of this information.

1.5. SMT understands the importance of protecting children's privacy, especially in an online environment. In particular, our Website is not intentionally designed for or directed at children under the age of 16. It is our policy never to knowingly collect or maintain information about anyone under the age of 16, except as part of an engagement to provide professional services.

2. Process of your personal data by SMT

2.1. SMT collects and processes your personal data when you visit or use the Website or because you provide such data when required and/or on your own initiative, for example by filling in a contact form or a request for information or for a quote, by applying for a job, by logging-in at MySMT, by contacting SMT via e-mail, etc.

2.2. Purposes of the data processing: SMT collects and processes your personal data for the following purposes:

- To improve and manage its Website and to make the Website available to its users;
- To manage its (potential) clients and to improve its operations, and more precisely:
 - a. To offer you information about products and services which may be of interest to you (unless you have not indicated that you wish to receive such information);
 - b. To provide clients with requested information or fee estimates on services or products offered by SMT, either by telephone or e-mail, or to supply clients with services or products ordered;
- Because the Website is also used as a recruitment tool and you may send a curriculum vitae to SMT, such information will be exclusively used by SMT for the following purposes:
 - a. Recruitment and selection purposes within SMT;
 - b. Communication purposes, for example to schedule an appointment should SMT wish to invite you to an interview or to inform you about new jobs; and
 - c. Assessment of your suitability for a position that is or may become vacant.

As a rule, SMT collects no more information from you than necessary for the completion of these purposes. Any cases where you are asked for compulsory information are explicitly indicated on the relevant web page.

2.3 Lawfulness of the data processing: the processing of your personal data is based on different legal basis's depending on the circumstances:

- Your consent (article 6.1.a UK-GDPR);
- The necessity for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract (article 6.1.b UK-GDPR);
- The compliance, by SMT, with a legal obligation (article 6.1.c UK-GDPR); or
- The pursue of the legitimate interests of SMT (article 6.1.f UK-GDPR).

2.4 Collected data: depending on the use of the Website, SMT potentially processes following data:

Personal identification data (name, surname, address), electronic identification data (email address, phone number, cookies); personal details (date of birth, place of birth, gender, marital status, nationality and language knowledge), a valid work permit; academic background; publications, information about the actual job, information about the recruitment, information about the end of the actual job; information about the career; information about the organization of work, remuneration data; assessments; pictures; data about security (like login and password); data about the hobbies and interests; data about your company; etc.

SMT does not request any special categories of personal data via the Website. Special categories of personal data include e.g. information about race or ethnic group, political preference, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. We dissuade you from providing us this type of particular personal data. Should you, however, supply such information for whatever reason, we assume that you explicitly grant SMT permission to process this information.

2.5. The recipients: SMT will treat your personal information confidential and will only disclose it to third parties in the situations mentioned in this article (and except if you explicitly request to do so). The Website is in any case not used to gather or to compile personal information in

order to disseminate it externally, to use it for sales activities of third parties and/or to deliver mailings on behalf of third parties.

If necessary to fulfil the purposes, SMT may use third party suppliers (for example for IT infrastructures, foreign servers, when necessary to send marketing information, ...), who could process personal data on instruction of SMT and on SMT's behalf.

Furthermore, SMT could share your data with other companies of the SMT group all around the world, depending on the circumstances, in order to ensure effective follow-up of the received applications or to provide services / products / information to a (potential) customer. In any case, it will only communicate the applications and requests it received to companies of the SMT group that are concerned by the application or request.

When SMT uses suppliers, or transfers data to companies of its group, SMT commits that appropriate measures are in place in order to protect the confidentiality of the data and to guarantee their integrity and, when the suppliers are based outside the EEA, to ensure an adequate level of data protection (for example, by the execution of ad hoc stipulations).

In the case this is prescribed by law, or justified in the concrete circumstances, SMT may communicate your personal data to the authorities in charge with the compliance with the rules (for example, the compliance with the rules on the protection of personal data, and more generally, the compliance with the laws (for example communication to the police)).

2.6. Right to withdraw your consent: When the processing is exceptionally based on your consent, you have the right to withdraw your consent at any time, for free, by writing an email at the following address: HRDept@smtgb.co.uk.

2.7. Right to request access, rectification, erasure, right to oppose and right of data portability: In any case, you have the right to access your data and to rectify it if it is incorrect or incomplete, to obtain their erasure or limitation or, in cases specified by law, to oppose against the processing of your data. Furthermore, you have the right to receive the data that concerns you in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (right to data portability). To exercise these rights, you can send, for free, an email to following address: HRDept@smtgb.co.uk.

SMT accepts its responsibility of carefully storing any personal data held by it after it has been supplied by you and checked for accuracy. SMT does not, however, accept any responsibility for the accuracy of content once personal data has been supplied. SMT shall update this data based on new information that we have received from you, the authorized visitor, once SMT has been made aware that certain personal information collected on the Website is no longer accurate.

2.8. Duration of the data retention: SMT will not retain your personal data any longer than is necessary for the realization of the purposes set out above with regard to the processing of your personal data unless this data is required for compliance with a statutory retention obligation or (if longer) until expiry of the retention period required by applicable conduct and professional practice.

2.9. Complaints: You can lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/make-a-complaint/> or Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF).

3. Cookies

3.1. SMT uses cookies on its Website, i.e. small information files that are transferred to the visitor's computer hard drive and which are saved temporarily or definitively on the visitor's computer, by the server of a website, via the navigator. This information makes it possible to simplify, complete or personalize the use of the Website. Most websites you visit use such cookies. Please do not hesitate to read our cookies policy for more info about this topic.

3.2. Insofar the cookies contain personal data, the visitor has the right to invoke his rights under the GDPR.

4. Contact

If you have any questions and/or complaints, please contact SMT at the following address: Moorfield Road, Duxford, CB22 4QX, Cambridge, England or by email at HRDept@smtgb.co.uk.