

ILUKA HOLDINGS LTD AND ITS SUBSIDIARIES PRIVACY POLICY

Last update: September 2020

This Privacy Policy sets out the data processing practices carried out through the use of the internet and any other electronic communications networks by iLUKA Holdings Ltd and its Subsidiaries (company number 12359684) of iLUKA House, 16 High Street, Hampton Wick, Kingston Upon Thames, KT1 4DB (and any of its Subsidiaries) (“iLUKA”, “we” or “us”).

We have appointed a data privacy champion who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy champion using the details set out below.

CONTACT DETAILS

Full name of legal entity: iLUKA Holdings Ltd

Title of data privacy champion: Matt Maher

Email address: hello@iluka.co.uk

Postal address: iLUKA Holdings Ltd, iLUKA House, 16 High Street, Hampton Wick, Kingston Upon Thames, KT1 4DB

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

This policy applies to the following websites:

- <https://www.iluka.co.uk>
- <https://www.ilukacollective.com>
- and any other website or online platform owned or operated by us and/or linking to this Privacy Policy (each a “**Website**”)

iLUKA will be the controller and responsible for your personal data.

1. DATA COLLECTED

- 1.1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 1.2. We collect personal information from visitors to this Website which we have grouped together as follows:
 - (a) Identity Data such as first name, last name and date of birth;
 - (b) Contact Data such as address, email address and telephone numbers;
 - (c) Technical Data such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website; and

(d) Usage Data such as information about how you use our website, products and services.

1.3. Only Technical and Usage Data are collected automatically when you visit any of the Websites (please see the section on how we collect your personal data for further information).

2. HOW WE COLLECT YOUR PERSONAL DATA

2.1. We use different methods to collect data from and about you including through:

- (a) Direct interactions. You may give us your Identity, Contact, and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- (b) Automated technologies or interactions. As you interact with our Website(s), we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see the section on cookies below.

3. USE OF PERSONAL INFORMATION

We have set out below, all the ways we use your personal data, and the legal bases on which we rely to do so.

Purpose	Category of Data	Lawful basis for processing including basis of legitimate interest
Administering and protecting our business and our websites: (a) (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To manage our relationship with you: (a) Notifying you of changes to our privacy policy (b) Contacting and corresponding with you in relation to employment opportunities	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)

4. DISCLOSURES

4.1. We may disclose personal information to other companies within our group of companies, government bodies and law enforcement agencies, successors in title to our business and suppliers we engage to process data on our behalf.

4.2. Personal data may be stored on cloud-based servers with authorised third parties.

5. SECURITY

- 5.1. We take the security of your information very seriously and have controls and processes to minimise the risk of a data breach occurring, though you must take responsibility when visiting other websites, even if following a link to them from our Website.
- 5.2. We have put in place procedures to deal with any suspected or actual personal data breach and will notify you or the appropriate regulator where we are legally required to do so, and we will make all efforts to minimise the impact.
- 5.3. We may use external companies to process information which are based overseas and outside Europe. We ensure that they have strict checks and controls in place to keep your information safe.

6. DOCUMENT RETENTION

- 6.1. We will only retain your personal data 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.
- 6.2. 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.

7. OTHER WEBSITES

Our Website may contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

8. ACCESS RIGHT

Under certain circumstances, you have rights under data protection laws in relation to your personal data such as:

- Requesting access to your personal data;
- Requesting a correction to your personal data;
- Requesting erasure of your personal data;
- Objecting to the processing of your personal data;
- Requesting a restriction on the processing of your personal data;
- Requesting a transfer of your personal data; and/or
- Your right to withdraw your consent.

If you wish to exercise any of these rights, please email us at hello@iluka.co.uk. No fee is usually required to exercise your rights under data protection law, however we may charge £10 if your request is clearly unfounded, repetitive, excessive or if you require further copies of the information that we have already sent you.

9. INTERNET-BASED TRANSFERS

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing this Website and communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

10. COOKIE POLICY

10.1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

10.2. Use of cookies:

- (a) We process personal information collected via this Website for the purposes of dealing with your enquiries and requests.
- (b) You can find more information about the individual cookies we use for www.iluka.co.uk and www.ilukacollective.com and the purposes for which we use them in the tables below:

Cookie	Name	Purpose	More Information
_ga	_ga	Used to differentiate users (Google Analytics)	https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
_gid	_gid	Used to differentiate users (Google Analytics)	https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
lang	lang	Identifies user's preferred language	
ARRAffinity	ARRAffinity	Keeps track of server the user has connected to – necessary for our cloud based hosting setup	https://azure.microsoft.com/en-gb/blog/disabling-arrs-instance-affinity-in-windows-azure-web-sites/

10.3. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

10.4. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.