

# Privacy & Cookie Policy

## Background:

Talley Group Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, <http://talleygroup.com> ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

## 1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

<b>"Account"</b>	means an account required to access and/or use certain areas and features of Our Site;
<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
<b>"Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
<b>"personal data"</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
<b>"We/Us/Our"</b>	means Talley Group Limited, a limited company registered in England under company number 00520386, whose registered address is 2 <sup>nd</sup> Floor, 45 Grovenor Road, St Albans, Herts, AL1 3AW, and whose main trading address is Abbey Park Industrial Estate, Premier Way, Romsey, Hampshire, SO51 9DQ.

## 2. Information About Us

- 2.1 Our Site is owned Talley Group Ltd and operated by Salestratus. Talley Group Ltd. is a limited company registered in England under company number 00520386, whose registered address is 2<sup>nd</sup> Floor, 45 Grovenor Road, St Albans, Herts, AL1 3AW, and whose main trading address is Abbey Park Industrial Estate, Premier Way, Romsey, Hampshire, SO51 9DQ.
- 2.2 Our VAT number is GB505374265.
- 2.3 Our Data Protection Officer is Gavin Colley, and can be contacted by email at DataProtectionEnquiries@talleygroup.com or by telephone on 01794 503500, or by post at Data Protection Officer, Talley Group Limited, Abbey Park Industrial Estate, Premier Way, Romsey, Hampshire, SO51 9DQ.
- 2.4 We are audited by SGS to ISO13485, we are regulated by Europeans Directive MDD93/42 EC and the FDA.

## 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site, emails, telephone calls and other on line and personal interactions you may have with us. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

## 4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
  - 4.1.1 The right to be informed about Our collection and use of personal data;
  - 4.1.2 The right of access to the personal data We hold about you (see section 12);
  - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
  - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
  - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
  - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - 4.1.7 The right to object to Us using your personal data for particular purposes;
  - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office.

## 5. **What Data Do We Collect?**

Depending upon your use of Our Site, and contact you may have with Us, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies) and similar technologies:

- 5.1 name;
- 5.2 title;
- 5.3 business/company name
- 5.4 job title;
- 5.5 profession;
- 5.6 contact information such as email addresses and telephone numbers;
- 5.7 demographic information such as post code and special requirements for delivery of products and to conduct services;
- 5.8 financial information such as credit / debit card numbers;
- 5.9 IP address;
- 5.10 web browser type and version;
- 5.11 operating system;
- 5.12 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

## 6. **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
  - 6.2.1 Providing and managing your Account;
  - 6.2.2 Providing and managing your access to Our Site;
  - 6.2.3 Personalising and tailoring your experience on Our Site;
  - 6.2.4 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);
  - 6.2.5 Personalising and tailoring Our products and services for you;
  - 6.2.6 Replying to emails and telephone calls from you;
  - 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking on the unsubscribe hyperlink);
  - 6.2.8 Market research;
  - 6.2.9 Clinical research collection and evaluation;
  - 6.2.10 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;

6.2.11 For monitoring the quality of the calls taken by our Customer Services team to ensure compliance, training and appropriate customer service experience.

6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email telephone, text message or post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

6.4 Third parties (including delivery companies and provision) whose content appears on Our Site or may be communicated in terms of the sales process, may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods:

<b>Record / Document Description</b>	<b>Duration of Retention*</b>
Customer Contracts / Orders and Order Reviews	CY + 10 years
Customer and Website Enquiries (unless opted 'in' to repeat mailing).	6 Months
List of Approved Suppliers / Supplier Files	CY + 10 years
Purchase Orders	CY + 10 years
Customer Returns	CY + 10 years
Equipment Maintenance / Environmental Monitoring	CY + 10 years
Supplier Evaluation Reports	LP + 10 years
Customer Complaints including Medical Device Reports & Recalls	LP + 10 years
Customer Suggestions / Post Market Surveillance	LP + 10 years

\* **Legend:** CY = Current Year, LP = Life of the Product (Length of time the product is manufactured), LC = Life of the Company

## 7. How and Where Do We Store Your Data?

7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

- 7.2 Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.4 Steps We take to secure and protect your data include:
  - 7.4.1 We employ security technology, including firewalls and encryption to safeguard personal data and have procedures in place to ensure that our paper and computer systems and databases are protected against unauthorised disclosure, use, loss and damage
  - 7.4.2 Personal data in our databases is only accessible by appropriately trained staff who need access to your data as an essential part of their role. All access is tracked through individual login credentials
  - 7.4.3 We only use third party service providers where we are satisfied that the security they provide for your personal data is at least as stringent as we use ourselves.
  - 7.4.4 Notwithstanding the security measures that We take, it is important to remember that transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us personal data via the internet.

## 8. **Do We Share Your Data?**

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes, except for delivery of products and services.
- 8.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority, or the Europeans Directive MDD93/42 EC and the FDA.
- 8.3 We may share your data with our Associate Company Talley Environmental Care Limited.
- 8.4 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.5 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.6 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## 9. **What Happens If Our Business Changes Hands?**

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## 10. **How Can You Control Your Data?**

10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. **Your Right to Withhold Information**

11.1 You may access certain areas of Our Site without providing any data at all.

11.2 You may restrict Our use of Cookies. For more information, see section 13.

## 12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at Data Protection Officer, Talley Group Limited, Abbey Park Industrial Park, Premier Way, Romsey, Hampshire, SO51 9DQ, or using the contact details below in section 14. Alternatively, please contact our Data Protection Officer using email [DataProtectionEnquiries@talleygroup.com](mailto:DataProtectionEnquiries@talleygroup.com).

## 13. **Our Use of Cookies**

13.1 We do not use any first party Cookies on our site.

13.2 By using Our Site you may receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for handling our shopping cart. For more details, please refer to section 6, above, and to section 13.6 below.

13.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.

- 13.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 13.5 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.6. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.9, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them
- 13.6 The following third party Cookies may be placed on your computer or device:

Cookie	Name	Purpose
_ga _gali _gat_UA-1036645-1 _gid	Universal Analytics (Google)	These cookies are used to collect information about how visitors use our website We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited.
PREF* VSC* VISITOR_INFO01_LIVE* remote_sid*	YouTube cookies	We embed videos from our official YouTube channel using YouTube’s privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode.
_dc_gtm	Google Tag Manager	These cookies are used to collect information about how visitors use our website We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited.
atuvc	AddThis	These cookies allow users to share content via Social Networking websites and email. AddThis is a thirdparty service and Treat Digital does not control which cookies are set by the AddThis widget, nor these cookies are used by Treat Digital for any specific purpose.  Some of these cookies are deleted when a user closes their browser, the others have a variable expiry date.
cookieBAR	Cookie acceptance	Once the user clicks 'Allow Cookies' or 'I understand', cookieBAR will set a cookie for user’s domain with a name 'cookieBAR' that will expire in 30 days. What this means is that the plugin will only show up once per domain (per month).

- 13.7 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products and services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.
- 13.8 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.
- 13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### **14. Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [DataProtectionEnquiries@talleygroup.com](mailto:DataProtectionEnquiries@talleygroup.com) by telephone on 01794 503500, or by post at Talley Group Limited, Abbey Park Industrial Estate, Premier Way, Romsey, Hampshire, SO51 9DQ. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

#### **15. Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.