

## Privacy Notice

**Last Updated: May 22, 2018**

We, at Provista UK Ltd ("Provista UK", "we" or "us"), are committed to protecting your Personal Data (as defined under the General Data Protection Regulation (the "GDPR") and regulations thereunder, each as amended or replaced from time to time, as promulgated by the Regulation (EU) 2016/679 of the European Parliament and the Council (collectively, the "Data Protection Laws")) in accordance with the Data Protection Laws. We understand that interacting with us online involves a great deal of trust on your part, and, for this reason, we have published this Privacy Notice (the "Notice") to provide you with (i) more visibility and a better understanding as to what kind of Personal Data we collect and how we handle and protect your Personal Data collected during your visits to Provista UK's website at [www.provista-uk.com](http://www.provista-uk.com) and company portals (collectively referred as "the Site") regardless of where you visit the Site from and (ii) to tell you about your privacy rights and how the Data Protection Laws protect you. We have also appointed a data protection officer to oversee our compliance with this Notice and the Data Protection Laws. Though we hope this Notice should answer all of your privacy-related questions, should you have any further questions, please feel free to submit them to us by sending an email to [dataprivacy@pcm.com](mailto:dataprivacy@pcm.com).

This Notice is the sole authorized notice of Provista UK's practices with respect to the online collection of Personal Data through the Site and the usage of such information. Any summaries of this Notice generated by third party software or otherwise shall have no legal effect, are in no way binding upon Provista UK, shall not be relied upon in substitute of this Notice, and neither supersede or modify this Notice.

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If you do not agree to the terms of this Notice, you should not use the Site. We reserve the right to update or modify this Notice from time to time, and, to the extent not prohibited under applicable law, such changes to the Notice will be effective immediately. You can tell if the Notice has been updated since you last reviewed it by checking the "Last Updated" date at the beginning of the Notice. Please bookmark this page and review it periodically to assure familiarity with the most current version of the Notice. If you do not agree to the terms of this Notice after it has been updated, you should not use the Site from and after the effective date of the update.

The Site is intended for use by residents of the European Economic Area (the "EEA") who are over the age of sixteen (16). We do not knowingly collect Personal Data from children, which, for purposes of this Notice is a minor younger than sixteen (16) years of age.

## OVERVIEW

To assist you with your review of this Notice, we have set up this Notice in a layered format so you can click through to the specific areas set out.

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## **WHAT INFORMATION WE COLLECT FROM YOU**

When you come to our Site, we collect information directly from you as well as through the use of cookies and web beacons about (i) your computer such as its IP address, operating systems and browser software and (ii) the website that you came from before visiting our Site, which pages of the Site you visited, the order in which the pages were visited, and which hyperlinks you clicked. This is all done for the purposes of (i) assessing our Site traffic and the effectiveness of our Site content; (ii) diagnosing problems with our servers, and (iii) improving the quality of your Site visits. We may collect Personal Data as well, which we describe further directly below. We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data may be derived from your Personal Data but is not considered Personal Data under the Data Protection Laws law except where we combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, in which case we treat the combined data as Personal Data.

We do not track you or collect any information from you when you are on third-party websites.

## **COOKIES**

Upon visiting our Site, we will assign you a unique ID in the form of a "cookie". A cookie is a piece of information that our server places in your computer's hard drive, which we may associate with your Personal Data when you log on to the site. Cookies are used for such purposes as facilitating and personalizing your shopping and ordering experience, keeping track of your shopping basket during your visit, helping diagnose problems with our server and administering our Site. We may use the information collected through cookies for marketing purposes, to better understand your needs, or to answer your questions. For more information about cookies please see our Cookie Policy or visit [www.networkadvertising.org](http://www.networkadvertising.org) and [www.youronlinechoices.com](http://www.youronlinechoices.com).

Please note that you may remove cookies from your computer at any time at your discretion as well as control how and when cookies will be accepted by your web browser. However, blocking or rejecting our cookies will prevent you from fully utilizing the Site, including, but not limited to, adding items to your shopping cart, proceeding to Checkout, or using any service that require you to sign in. Therefore, we recommend, that you leave cookies on and accept our use of your Cookies as prompted when you enter our Site.

## **WEB BEACONS**

Some of our Web pages and HTML-formatted e-mail newsletters may use Web beacons to compile aggregated data and statistics about website usage. A Web beacon is an electronic image often called a single-pixel (1x1) or clear GIF, which is ordinarily not visible to the site visitor. Web beacons can recognize certain types of information on your computer, such as your cookie number, time and date of page or image view, and the description of the page where the web beacon is placed. When used in an e-mail, they can tell us whether an e-mail has been opened. You may control whether your email is allowed to download images and Web beacons.

## **WHAT PERSONAL DATA WE COLLECT**

Personal Data, or personal information, means any information, protected under the GDPR, about an individual from which that person can be identified. When you use our site, we may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- Identity Data: first name, last name, username or similar identifier, demographic information, title, and gender
- Contact Data: e-mail address and telephone numbers
- Technical Data: internet protocol (IP) address, your login data, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- Profile Data: username and password, your interests, your preferences, and your feedback
- Usage Data: information about how you use our website, products, and services
- Marketing and Communications Data: your preferences in receiving marketing from us and our third parties and your communication preferences

## **HOW WE COLLECT PERSONAL DATA**

We use different methods to collect Personal Data from and about you, including through:

- Direct Interactions: You may give us your Identity and Contact Data by filling in forms or providing other information via our Site. This may include Personal Data you provide when you request our services, subscribe to our publications, request marketing to be sent to you, or give us some feedback.
- Automated Technologies or Interactions: As you interact with our Site, we may automatically collect Technical Data about your equipment, browsing actions and patterns.
- Third Parties or Publicly Available Sources: We may receive Personal Data about you from various third parties and public sources.

## **WHAT GDPR PRINCIPLES WE COMPLY WITH WHEN PROCESSING YOUR PERSONAL DATA**

When processing your Personal Data, we take appropriate steps to ensure that:

- Personal Data is processed fairly and lawfully;
- Personal Data is processed only for specified and lawful purposes;
- Personal Data that is processed is adequate, relevant and not excessive;
- Personal Data that is processed is accurate and, where necessary, kept up to date;
- Personal Data is not kept longer than necessary;
- Personal Data is processed in accordance with an individual's consent and rights;
- Personal Data is kept secure;
- Personal Data is shared only with third party processors and/or third party service providers for pre-determined lawful basis of processing; and
- Personal Data is not to our knowledge transferred to countries outside of the EEA without adequate protection.

## **OUR LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA**

The lawful basis of processing of Personal Data (the "Lawful Basis") will always be determined prior to any Personal Data being processed. Provista UK processes Personal Data under one or more of the following Lawful Bases:

- Consent: The individual has given their consent to the processing of their Personal Data.
- Contractual: The processing of Personal Data is necessary for (i) the performance of a contract to which the individual whose Personal Data is being processed is a party to the contract or an employee, associate, or agent of the party to the contract or (ii) Provista UK to take pre-contractual steps at the request of the individual who is to be the party or an employee, associate, or agent of the party to the contract;
- Legal Obligation: The processing of Personal Data is necessary for compliance with a legal or regulatory obligation to which Provista UK is subject.
- Legitimate Interests: Provista UK and/or a third party has a legitimate interest (i.e. a clearly articulated benefit) that can be derived from processing the Personal Data in a lawful way, unless these interests are overridden by the interest or fundamental rights of an individual who is a party to the contract or an employee, associate, or agent of the party to the contract.

## **HOW WE USE THE PERSONAL DATA WE COLLECT**

We have set out below all the ways we plan to use your Personal Data, and which of the Lawful Basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. We use the Personal Data that you've provided us:

- To manage our relationship with you, which includes fulfilling requests for products, services, and/or information, provide customer service and/or review and reply to any inquiries, and tailor online offerings to your preferences. We use Identity Data, Contact Data, Profile Data, and Marketing and Communications Data to do so. Our Lawful Basis is that processing such Personal Data is (i) necessary to comply with a legal obligation and (ii) necessary for our legitimate interests i.e. to keep our records updated and to study how our clients use our products and services;
- To make recommendations and suggestions to you about products and services that may be of interest to you. We use Identity Data, Contact Data, Usage Data, and Profile Data to do so. Our Lawful Basis is that processing such Personal Data is necessary for our legitimate interests i.e. to develop our products and services and to grow our business;
- To measure and improve the effectiveness of our Site and our marketing endeavours in such a manner as

you have provided us your opt-in consent to do so. We use Technical Data and Usage Data to do so. Our Lawful Basis is that processing such Personal Data is necessary for our legitimate interests i.e. to define types of clients for our products and services, to keep our website updated and relevant, to develop our business, and to inform our marketing strategy;

- To administer promotions or surveys. We use Identity Data, Contact Data, Usage Data, and Profile Data to do so. Our Lawful Basis is that processing such Personal Data is necessary for our legitimate interests i.e. to grow our business;
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. We use Identity Data, Contact Data, Profile Data, Usage Data, and Marketing and Communications Data to do so. Our Lawful Basis is that processing such Personal Data is necessary for our legitimate interests i.e. to study how clients use our products/services, to develop and grow our business, and to inform our marketing strategy;
- For employment opportunities. We use Identity Data, Contact Data, Profile Data, and Marketing and Communications Data to do so. Our Lawful Basis is that processing such Personal Data is necessary for our legitimate interests i.e. to grow our business; and
- To achieve other business purposes as permitted under applicable law. We use Identity Data, Contact Data, Profile Data, Usage Data, and Marketing and Communications Data to do so. Our Lawful Basis is that processing such Personal Data is necessary for our legitimate interests i.e. to study how clients use our products/services, and grow our business, and to inform our marketing strategy.

## **HOW WE SHARE OR DISCLOSE PERSONAL INFORMATION WE COLLECT**

We may disclose and you consent to the disclosure of Personal Data to (i) our affiliated or related companies, including our parent company, affiliates, and subsidiaries, or our parent company's other subsidiaries (collectively, the "Affiliates"); (ii) our service providers, product providers, consultants, professional advisors and contractors (collectively, the "Service Providers") who perform services for us or provide us products; and (iii) unaffiliated third party individuals or entities, such as our marketing or business partners, in no way affiliated with us or our affiliates (collectively, the "Third Party Entities"). Such Personal Data is only disclosed to and used by our Affiliates, Service Providers, and Third Party Entities to the extent necessary for them to carry out their respective obligations arising from any contracts you and/or we have entered into with them. Please note we require our Affiliates, Service Providers, and Third Party Entities to respect your Personal Data and to treat it in accordance with the Data Protection Laws.

To the greatest extent not prohibited under applicable law, we reserve the right to disclose Personal Data concerning any visitor when that visitor is believed by Provista UK to be in violation of any published guidelines for the use of the Site or participates (or is suspected of participating) in any illegal or potentially illegal activity. We also reserve the right to disclose Personal Data (i) to comply with applicable laws or a regulatory request; (ii) in response to subpoenas, discovery requests or as otherwise required by legal process; (iii) when we believe in good faith that disclosure is required to protect the rights, property, safety or security of Provista UK, our visitors, or the public; or (iv) to respond to an emergency.

In the event that we sell or otherwise transfer to a third party assets related either (a) to the Site (b) to one or more of our businesses, divisions or affiliated companies, we reserve the right to also transfer any and all information (including any Personal Data) associated with the Site and/or any business, division or affiliated company to such third party.

## **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

We may share your Personal Data with our Affiliates. This will involve transferring your data outside of the EEA, which may have a lesser standard of data privacy laws compared to those in your country of residence. You hereby acknowledge that we may disclose your Personal Data to recipients outside of the EEA.

To ensure that your Personal Data is protected when transferred to our Affiliates outside the EEA, an international data processing agreement has been put in place between us and our Affiliates incorporating the applicable requirements and obligations of the Data Protection Laws.

Furthermore, we have taken appropriate steps to ensure that, where we transfer your Personal Data to Service Providers and Third Party Entities based outside of the EEA, such Service Providers and Third Party Entities have at least one of the following safeguards in place:

- Such Service Provider or Third Party Entity is located in a country deemed to provide an adequate level of protection for Personal Data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

- Such Service Provider or Third Party Entity has agreed to a specific contract approved by the European Commission that requires such Service Provider or Third Party Entity to give your Personal Data the same level of protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Such Service Provider or Third Party Entity is part of the Privacy Shield which requires such Service Provider or Third Party Entity to provide similar protection to Personal Data shared between the EEA and the United States. For further details, see European Commission: EU-US Privacy Shield.

Please contact us at [dataprivacy@pcm.com](mailto:dataprivacy@pcm.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## HOW WE PROTECT YOUR PERSONAL INFORMATION

To help protect the security of your Personal Data, we have put in place appropriate security technology and procedures designed to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered, or improperly disclosed. We use encryption technology and Secure Socket Layers ("SSL") in all areas of the Site where your personal account information is required, which means the Personal Data you submit to us via our Site is encrypted by your computer and decrypted again on our side. If your browser does not support SSL or if you are unable to establish a secure connection due to a company firewall, please contact us at [dataprivacy@pcm.com](mailto:dataprivacy@pcm.com). In addition, your personal account information and transaction history are kept behind a firewall.

In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will be required to process your Personal Data only on our instructions and they are subject to a duty of confidentiality.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the "Contacting Provista UK" section below.

## HOW LONG PERSONAL DATA IS STORED

We review our retention periods for Personal Data on a regular basis. Generally, we will hold Personal Data on our systems for as long as is necessary for the relevant activity or as long as is set out in any relevant contract you hold with us. However, at times, we are legally required to hold some types of Personal Data for much longer to fulfil our statutory obligations.

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.

The accuracy of Personal Data is imperative. We aim to keep it updated at all times. The Personal Data of yours that we hold is available upon request by contacting [dataprivacy@pcm.com](mailto:dataprivacy@pcm.com). You can request that your data is corrected, updated, and/or erased at any time, unless PCM can justify that it is retained for a legitimate business or legal purpose. When updating your Personal Data, you may be asked to verify your identity before your request can be actioned.

## ADVERTISERS

With respect to outside advertising companies ("Advertisers") who serve advertisements on the Site, we strive to only work with companies that are members of the Network Advertising Initiative (NAI) and/or the Interactive Advertising Bureau (IAB), allow you to opt out of the behavioral advertising, and ensure adherence to industry standards and codes of conduct. Please be advised that such Advertisers may place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice and to learn about your choices in connection with these practices, please visit [www.networkadvertising.org](http://www.networkadvertising.org) and [www.youronlinechoices.com](http://www.youronlinechoices.com).

## REMARKETING WITH GOOGLE ANALYTICS

We also use Remarketing with Google Analytics to advertise online. Remarketing with Google Analytics allows third-party vendors, including Google, Inc. ("Google"), to display our ads on third-party sites across the Internet by studying your use as well as other visitors' past use of our Site and other websites. You can learn about Google's practices in connection with this remarketing and opt out of it by visiting <https://tools.google.com/dlpage/gaoptout>.

## **GOOGLE ANALYTICS**

Our Site uses Google Analytics, a web analytics service provided by Google which uses cookies and similar technologies monitoring those who visit our Site to help us analyze how visitors use our Site. Google Analytics analyzes our Site visitor data by transmitting information generated about our Site usage, including visitor IP address, to Google, where Google evaluates visitors' use of the Site, compiles statistical reports on website activity, and provides other services relating to website activity and internet usage. During this process, Google may also collect information about Site visitors' use of other websites. Google does offer the ability to opt out from tracking through Google Analytics cookies. To do so, please visit <https://tools.google.com/dlpage/gaoptout>.

## **GOOGLE DISPLAY NETWORK IMPRESSION REPORTING**

We use Google Display Network Impression Reporting to analyse visitors' interactions with our ads. Provista UK and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to report how ad impressions and ad services are related to visits to our Site. You can learn about Google's practices in connection with this reporting and opt out of it by visiting <http://www.google.com/settings/ads> or by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

## **SWEEPSTAKES AND PROMOTIONS**

We may, from time to time, offer sweepstakes, contests, or other similar promotions on the Site. Additional Personal Data may be required in order to participate in such promotions so that we may, for example, verify entrants' eligibility and identify and notify winners. Participation in such promotions is completely voluntary. If and when we sponsor such promotions, we will post relevant privacy information in the respective "official rules" and/or registration areas for such promotions. That privacy information, to the extent it conflicts with this Notice, will govern that particular sweepstakes, contest or promotion. Therefore, please remember to read the "official rules" for the sweepstakes, contest, or promotion carefully.

Other companies may offer sweepstakes, contests or similar promotions through our Site, including through the Rebate and Coupon page. We are not responsible for any such promotions offered by third parties. Please read all related terms and conditions carefully, or contact the applicable third party for more information. The collection and use of Personal Data in connection with such third-party promotions is governed by such third party's privacy policy and not by our policies.

## **CO-BRANDED SITES: LINKS TO OTHER SITES**

The Site offers certain features that are provided and/or hosted by third parties but that may be presented on pages displaying Provista UK's branding. The Site may also contain links to other websites or affiliated sites (e.g. events, sponsors, or companies offering rebates or other promotions through our Rebates and Coupon Page). Clicking on those links or enabling those connections may allow third parties to collect or share Personal Data about you. We do not control these third party websites and are not responsible for the privacy practices or the content of any such websites, including such website's use of any information (such as IP address, browser type or operating system) collected when visitors to the Site click through links to those websites. Even though the information collected by third party websites may not identify you personally, we encourage you to become familiar with the privacy practices of any third party websites.

## **CHANGE OF PURPOSE**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [dataprivacy@pcm.com](mailto:dataprivacy@pcm.com). If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the Lawful Basis which allows us to do so. Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **YOUR OTHER RIGHTS**

Aside from requesting your Personal Data be corrected, updated, or erased, you are also entitled to:

- Object to the processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and your particular situation allows you to object such processing of your Personal Data on the grounds it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, however, we may demonstrate that we have compelling legitimate grounds to process your Personal Data which override your rights and freedoms.
- Request restriction of the processing of your Personal Data (a) if you want us to establish the Personal Data's accuracy; (b) where our use of the Personal Data is unlawful but you do not want us to erase it; (c) where you need us to hold the Personal 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 Personal Data but we need to verify whether we have overriding legitimate grounds to use it.
- Withdraw your consent at any time where we are relying on your consent to process your Personal Data. Please note this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

## **ONLINE VS. OFFLINE PRACTICES**

Please note that this Notice applies solely to our online information-gathering and dissemination practices in connection with the Site and does not apply to any of our practices conducted offline other than as expressly set forth in this Notice.

## **COMPLAINTS, QUESTIONS AND SUBJECT ACCESS REQUESTS (SARS)**

You have a right to lodge a complaint at any time to your respective supervisory authority in the event that you believe that we have not upheld the rights, obligations and responsibilities set out in this Privacy Notice. The Information Commissioner's Office (ICO) is the U.K. supervisory authority for data protection issues. Without limiting your rights, we would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **CONTACTING PROVISTA UK**

Should you have any complaints, questions, or Subject Access Requests (SARs), please send your inquiries to [dataprivacy@pcm.com](mailto:dataprivacy@pcm.com).