



## General Data Protection Regulation

### Customer and Web Site and Social Media Visitor Privacy Policy

#### Introduction and Aims

We are committed to safeguarding the privacy of our customers, website and social media visitors; being transparent in how we collect and treat your personal information in ways that comply with our legal obligations.

#### Privacy at AFE Group Ltd

It is the AFE Group Ltd policy to:-

- Process your personal information fairly and in accordance with applicable laws;
- Tell you (either directly or in our policies) about how we will use your personal information
- Only collect personal information from you when we need it for legitimate purposes, or legal reasons
- Ensure that your personal information is adequate, relevant and not excessive for the purpose for which we collect it;
- Not keep your personal information for longer than we need to
- Keep your personal information secure, and limit the people who can access it
- Ensure that you know how to access your personal information and exercise your rights in relation to it, including being able to keep it accurate and up-to-date; and
- Ensure that any third parties we share your personal information with take appropriate steps to protect it

#### Some of the key points of the AFE Group privacy statement are:

- We do not sell your data to third parties
- We wish to make it easy for you to manage your information, so you can change your communication preferences at any time
- We do use data to help us monitor and improve customer service, which includes tailoring the information we share with you to help ensure that it's relevant, useful and timely

#### Application

The AFE Group Ltd is recognised as a leading international business specialising in the innovative design, manufacture and service support of professional cooking, bakery and refrigeration equipment for the global food service market. We operate from 15 locations worldwide, including eight in the UK, together with operations based in France, UAE, China and Australia. AFE Group Ltd is organised into five autonomous business units trading under the business and brand names of:-

Brand Business	Activity	Website
The AFE Group	Holding Company	<a href="http://www.theafegroup.com">www.theafegroup.com</a>
Williams Refrigeration	Refrigeration Equipment	<a href="http://www.williams-refrigeration.com">www.williams-refrigeration.com</a> <a href="http://www.blastchill123.com">www.blastchill123.com</a> <a href="http://www.greenlogic.info">www.greenlogic.info</a>
Falcon Foodservice Equipment	Commercial Cooking & Catering Equipment	<a href="http://www.falconfoodservice.com">www.falconfoodservice.com</a> <a href="http://www.shop.falconfoodservice.com">www.shop.falconfoodservice.com</a> <a href="http://www.falconF900.com">www.falconF900.com</a>
Mono Equipment	Bakery Equipment	<a href="http://www.monoequip.com">www.monoequip.com</a>
Millers Vanguard	Maintenance and service of bakery and foodservice equipment	<a href="http://www.millersvanguard.co.uk">www.millersvanguard.co.uk</a>
Serviceline	Maintenance and service of foodservice equipment	<a href="http://www.service-line.co.uk">www.service-line.co.uk</a>

This site, together with the associated sites and mobile applications operated by AFE Group business units (together, the "website") are operated by AFE Group Limited ("we" or "us").

By using and visiting our website and by submitting your personal information to us, you agree to us using your personal information as set out in this privacy policy. This privacy policy contains important information about how we use your personal information and covers the following areas:

- What personal information do we collect?
- How do we use your personal information?
- Your personal information and our links to third parties
- Using your information for marketing and monitoring
- Where do we send your personal information?
- How long do we keep your personal information?
- Cookies
- Third Party Websites and international transfers
- How do we protect your personal information?
- Your rights
- Changes to this Privacy Policy and/or the Cookies Policy
- How to contact us

#### What personal information do we collect?

At times we may request that you supply us with personal information. Generally this personal information is requested when you want us to provide you with information or a service. We may collect and process the following information about you:

- Information you provide to by filling in forms on the website including name, address, email address, telephone number, AFE Group account number, company details and details of your employer.
- Careers and job application details
- You may also provide us with delivery, billing and payment information

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- If you contact us, we may keep a record of that correspondence;
- Details of transactions carried out through our website or through other channels and of the fulfilment of your orders;
- Any personal information or preferences you may provide to us in comment boxes or while using our "Live Chat" functionality; or online web portal service "My Serviceline"
- Details of your visits to the website and information collected through cookies and other tracking technologies, including but not limited to your IP address (a unique identifier for your computer or other device) and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

### How do we use your personal information?

We will use your personal information in the following ways:

- To maintain our relationship with you, communicate with you, and provide you with information about, or any changes to our products, services and pricing.
- To help us customise various aspects of our web sites to improve your experience, and ensure that the content, services and advertising that we offer are tailored to your needs and interests;
- To monitor the quality of our products and services and to investigate any concerns or complaints you may make; or disputes between you and us
- To create and run your user sales account; including to obtain credit references, credit checks and trade screening for debt collection, fraud detection and prevention and business risk management purposes
- To process your order and carry out our obligations arising from any contracts entered into between you and us;
- To provide after-sales services to you, including but not limited to administering warranty, service, return or refund policies;
- For statistical analysis, research, internal reporting, record keeping.
- To provide you with suggested local distributors who stock products that you are interested in;
- In order to market our own products and services to you by post, e-mail, SMS, social media or over the telephone long as this is in line with any marketing preferences you have provided us with, and where you have consented to this, or where you have not objected to this and we are marketing similar products and services to those which were subject to a previous sale or negotiations with you
- For training, quality control and staff safeguarding purposes; and
- To enable you to use interactive features on our website such as an instant messaging service called "Live Chat" and online web portal service "My Serviceline".

Where Live Chat is available, it allows you to message a member of our staff so that they can answer your queries and provide information in real time. Live Chat is provided by a third party. When you use Live Chat, third parties place cookies on your computer to enable the service to work (please see our Cookies Policy for further detail). When you message our staff, we and related third parties will process this information which may include information that you have provided about yourself.

### Your personal information and our links to third parties

We may send your personal information to other group companies, affiliates, business partners (such as the Live Chat service provider) and selected third parties to help us process your personal information for the purposes set out in this policy, who will be subject to obligations to process such information in compliance with the same safeguards that we deploy.

We may disclose your personal information if we (or any part thereof), or any of our assets are subject to negotiations for sale or similar corporate transaction, are sold to a third party or undergo a reorganisation. We will require that the third parties who receive your personal information are required to keep it confidential. Where our business is sold/reorganised you agree that any of your personal information may be transferred to that re-organised entity or third party and used for the same purposes under this Privacy Policy or for the purposes of analysing any proposed sale or re-organisation.

We may disclose personal information to third parties, the court service and/or regulators or law enforcement agencies when we reasonably believe we are required by law or in connection with proceedings or investigations anywhere in the world.

AFE Group Ltd will only pass your personal information to a third party where there is a valid lawful basis or you have given your consent. The third party will be acting as a processor of your personal information

### Using your information for marketing and monitoring

We may use your personal information for reporting, and marketing in association with other AFE business units, affiliates and Ali Group Companies. We may also use your personal information in association with business partners and third parties for:-

Marketing, market research, advertising, and customer relations management purposes.

- Logistics, software, and recruitment providers
- Service providers and agents we appoint as our sales agents or to perform services on our behalf.
- Our professional advisors including accountants, lawyers credit reference agencies and debt collection agencies
- Emergency services, Government departments and public body in the event that we need to report accidents or incidents

We may send you marketing information about our own and other organisations' goods and services. We may contact you by mail, telephone, email or SMS with offers of products, services or information that may be of interest to you and where required by law, we will ask you for your consent at the time we collect your personal information to conduct any of these types of marketing.

For quality control, training and staff safeguarding purposes, we may monitor or record your calls with us and the transcripts of our "Live Chat" service. When you use the "Live Chat" function, we may collect your name and address.

You can choose to opt out of receiving direct marketing information from us at any time through the 'unsubscribe' link at the bottom of any email you receive or by contacting the customer service centre at the respective AFE business unit.

**Recruitment** : If you choose to apply for a job that is listed on our website, we may ask you to complete an application form and upload a CV, supporting documents and covering letter. Before you submit these documents to us you will be signposted to a privacy notice which provides specific information on how your personal information will be handled in connection with your application.

**Credit Checks**: We use technology provided by credit reference agencies that process personal information that you provide us in order to analyse your creditworthiness, which helps us to decide if we are able to offer you an account through which you can purchase products and services from AFE Group Ltd. We will continue to exchange information about you with the credit reference agencies on an ongoing basis, including details about your settled accounts, and any debts not fully repaid on time. Credit reference agencies may share this information with other organisations which may use it to make decisions on future applications for credit.

### **Where do we send your personal information?**

We are a global company and therefore your personal information may be transferred, accessed, processed or stored in countries around the world including the US and other countries than the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. Regardless of location, we will, where necessary, put in place appropriate safeguards to ensure your information is adequately protected.

### **How long do we keep your personal information?**

We will keep your information for as long as is necessary for the processing purpose for which they were collected. Certain transaction details and correspondence may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such personal information.

#### **Cookies**

Where you use our web sites, we will process your personal information collected by using cookies in accordance with our cookies policy. For more information on the use of cookies on our websites please go to our cookies policy.

By restricting our cookies you may not be able to access certain areas or features of our website.

### **Third Party Websites and International Transfers**

Our website links to other Ali Group companies and certain third party sites which we do not operate or endorse. These websites may use cookies and collect your personal information in accordance with their own privacy policies. This privacy policy does not apply to other Ali Group and third party websites and we are not responsible or liable for third party websites, their policies or their processing of your personal information.

### **How do we protect your personal information?**

No data transmission over the Internet or site can be guaranteed to be secure from intrusion. However, we take commercially reasonable physical, electronic and procedural measures to protect the personal information disclosed to us in accordance with data protection legislative requirements.

All personal information you provide to us is accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

We use no encryption (data scrambling) on certain portions of the Site, but use encryption on portions where you are transmitting financial information, such as credit card information. When you are on any web site that asks you for confidential information, you should check to see if the information being transmitted is encrypted in order to increase the security of your information. Keep in mind that there is no such thing as perfect security.

### **Your rights**

You have a right to be provided with clear and transparent information about how we use your personal information,

- You have a right of access and are entitled to ask for a copy of the information we hold about you (for which we may charge a small fee in certain jurisdictions).
- You can ask us to have any inaccuracies in your information corrected.
- You have a right to object, where legitimate, to the processing of personal information relating to you. Please note that there may be certain categories of information we are entitled not to provide.
- You have a right 'to be forgotten' and request the deletion or removal of your personal information where there is no compelling business reason for us to keep it, or its use is unlawful.
- You have a right to restrict, block or suppress further use of your personal information as an alternative to erasure.

Please contact us using the details set out below to exercise your rights.

### **Changes to this Privacy Policy and/or the Cookies Policy**

We may update this Privacy Policy and/or the Cookies Policy at any time. Where appropriate, any such changes will be notified to you and you are encouraged to review this Privacy Policy and the Cookies Policy from time to time. Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.

### **How to contact us**

AFE Group Limited is the data controller in respect of your personal information processed by us under this Privacy Policy.

If your personal information changes, you don't want us to send you the information you have requested (including to opt-out of future marketing), you wish to exercise any of your right or if you have any queries about how we use your personal information, please let us know by contacting the AFE Group Data Protection Officer at

Bryggen Road, North Lynn Industrial Estate Kings Lynn Norfolk PE30 2 HZ

Telephone : + 44 (0)1553 817554

Email [dataprivacy@theafegroup.com](mailto:dataprivacy@theafegroup.com)

If after contacting AFE Group Ltd you are still unhappy you may also complain to the Information Commissioner. Contact details can be found at the website [www.ico.org.uk](http://www.ico.org.uk)