

1. Background

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all products and services, and instances where we collect your personal data.

This privacy notice applies to personal information processed by or on behalf of SPI Lasers UK Ltd / SPI Lasers LLC / SPI Lasers (Shanghai) Co Ltd / SPI Lasers Korea Ltd

Use the links below to find out more about how we use your personal information:

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Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – <https://www.spilasers.com>

SPI Lasers UK Ltd and our Data Protection Coordinator

We are SPI Lasers UK Ltd, 6 Wellington Park, Tollbar Way, Hedge End, Southampton, SO30 2QU, United Kingdom. We are a data controller of your personal data. The SPI Lasers company or companies which provide your product or service are named at the start of these terms and conditions.

We have a dedicated Data Protection Coordinator (“DPC”). You can contact the DPC by writing to the above address, marking it for the attention of the DPC or going to [Contact Us](#).

2. What kinds of personal information about you do we process?

Personal information that we’ll process in connection with all of our products and services, if relevant, include:

- **Personal and contact details**, such as title, full name, contact details, address and contact details history

- **Your date of birth, and/or age**
- **Your nationality**, if needed for the product or service
- **Records of your contact with us** such as via the phone number of our customer service department and, if you get in touch with us online using our online services or via a sales representative, details such as your mobile phone location data, IP address and MAC address
- **Products and services** you hold with us, as well as have been interested in and have held and the associated payment methods used
- **The usage of our products and services**, any 'onsite' call outs and warranty claims and whether those claims were paid out or not (and details related to this)
- **Marketing to you and analysing data**, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analysing data to help target messages to you that we think are of interest or relevance to you.
- **Information about your use of products or services held with our business partners**, such as machine builders who we pass on your details to if you have contacted us requiring a full system, Distributors who we will forward your details to if we cannot help you directly via one of our global sales representatives
- **Information obtained during the recruitment process**, in addition to CV's you may personally supply us, we use an applicant tracking system to capture online applications made through our website. Information regarding how your personal data is held in this system will be provided at the time of application.
- **Information we obtained from third parties**, including information about key company contact, application requirement, company size, budget, order size and future predictions and laser usage history
- **Personal information which we obtain from Credit Reference Agencies and Fraud Prevention Agencies** (see the section on 'Fraud Prevention Agencies' below), including public (for example, defaults, CCJs) and shared credit history, financial situation and financial history
- **Fraud, debt and theft information**, including details of money you owe, suspected instances of fraud or theft, and details of any devices used for fraud
- **Information about your employment status**, if relevant
- **Information we buy or rent from third parties**, including demographic information, company details, marketing lists, publicly available information, and information to help improve the relevance of our products and services
- **Insights about you and our customers** gained from analysis or profiling of customers
- **Third party transactions**; such as where a person other than the account holder uses the service, information about that person and the transaction e.g. if the company has multiple sites and the product / service is used in a different site to the original billing address

3. What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly, and any information from associates or beneficiaries of products and services
- When you complete registration forms, or provide us with your details over the phone, for example when you register an account with us, register to attend one of our events, or provide us with your business card
- When you visit our website and consent to our cookie policy
- Information generated about you when you use our products and services
- From a distributor, intermediary or reseller (for example, one of the other SPI Lasers Group companies) who we work with to provide products or services for you
- SPI Lasers group companies if you already have a product with them, have applied for one or have held one previously
- From other sources such as Fraud Prevention Agencies, Credit Reference Agencies, other lenders, HMRC, DWP, publicly available directories and information (for example, telephone directory, social media, internet, news articles)
- We buy or rent information about you or customers generally from third parties including demographic information, company details, manufacturing history, marketing lists, publicly available information and other information to help improve our products and services or our business

- We may collect information about you from third parties that we work closely with for the purposes of delivering to you the goods and services that you request from us.
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4. Cookies

We use cookies to ensure that you get the most out of our site. Cookies are small text files which we store on the device you use to access the site. Cookies allow us to monitor your use of the software and simplify your use of the site. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie (which is not stored after you quit your browser) you would have to log on every time you access a new page.

If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of our websites.

5. What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 2 above, for the following purposes:

- Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms
- Managing any aspect of the product or service you have with us
- Recording your 'purchasing' information so we can link your details to your order
- Arranging the delivery / shipping of ordered goods and services
- Updating your records, tracing your whereabouts and recovering debt
- To contact you to answer queries you may have
- To perform and/or test the performance of, our products, services and internal processes
- To improve the operation of our business and that of our business partners
- To follow guidance and best practice under the change to rules of governmental and regulatory bodies
- For management and auditing of our business operations including accounting
- To carry out checks at Credit Reference and Fraud Prevention Agencies pre-application, at application, and periodically after that
- To monitor and to keep records of our communications with you and our staff (see below)
- To administer our good governance requirements and those of other members of the SPI Lasers group of companies, such as internal reporting and compliance obligations
- For market research and analysis and developing statistics
- Assessing and profiling aspects of your company (including faults), business style, output, location and future growth plans (if relevant to your product or service)
- For direct marketing communications and related profiling to help us to offer you relevant products and service, including deciding whether or not to offer you certain products and service. We'll send marketing to you by SMS, email, phone, post, social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match). Messages may relate to any of our products and services such as Pulsed and CW Lasers, Process Tools, Service and Support options as well as to any other offers and advice we think may be of interest
- To provide personalised content and services to you, such as tailoring our products and services, our digital customer experience and offerings, and deciding which messages to show you on our digital channels
- To develop new products and services and to review and improve current products and services
- To comply with legal and regulatory obligations, requirements and guidance
- To provide information required for an insurance purpose (for example, advising on, arranging, providing or managing an insurance contract, dealing with a claim made under an insurance contract, or relating to rights and responsibilities arising in connection with an insurance contract or law)

- To establish, make or defend legal claims (for example, claims against us for insurance)
 - To provide insight and analysis of our customers for ourselves to help improve the provision of products or services, or to assess or improve the operating of our businesses
 - To share information, as needed, with business partners (for example, distributors or machines builders), account management representatives, internal service teams or as part of providing and administering our products and services or operating our business
 - To enable other SPI Lasers Group companies to perform any of the above purposes
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6. What is the lawful basis for our processing of your personal information (including when we share it with others)?

We rely on the following lawful bases to use your personal data:

1. To comply with our **legal obligations**. For example, if you have made a purchase from us, then we must hold a record of that purchase to meet our legal requirements. Other legal obligations include:
 - a) Health & Safety
 - b) Product Recalls
 - c) Customs regulations
 - d) Export control
 - e) Arms embargoes, trade sanctions, and financial sanctions
 - f) Modern slavery and conflict minerals
 - g) Anti money laundering and financial crime
 - h) Bribery and corruption
 - i) To keep to laws and regulations that apply to us and the third parties we work with
2. **Where processing is necessary for the performance of a contract** to which you or your organisation are a party to, or in order to take steps at your request prior to entering into a contract. These include:
 - a) Assessing an application for a product or service you hold with us, including considering whether or not to offer you the product, the price, the payment methods available and the conditions to attach
 - b) Managing products and services you hold with us, or an application for one
 - c) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
 - d) Sharing your personal information with business partners and services providers when you enquire or apply for a product to help manage your product
 - e) All stages and activities relevant to managing the product or service including enquiry, application, administration and management of accounts, illustrations, requests for transfers of equity, setting up/changing/removing guarantors, applying for export licences (if needed), shipping, installation, and after sales support including warranty provision and repair services.
3. Where **it is in our legitimate interests to do so**, such as:
 - a) Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
 - b) To develop perform and/or test the performance of, our products, services and internal processes
 - c) To follow guidance and recommended best practice of government and regulatory bodies

- d) To comply with our ISO9001 registration
- e) For management and audit of our business operations including accounting
- f) To carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after that.
- g) Health and Safety including product safety and ensuring traceability of our products
- h) To carry out monitoring and to keep records of our communications with you and our staff (see below)
- i) To administer our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations
- j) For market research and analysis and developing statistics
- k) For direct marketing communications and related profiling to help us to message you regarding relevant products and services, including deciding whether or not to offer you certain products and service. We will send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match)
- l) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
- m) For some of our profiling and other automated decision making to decide whether to send you messages regarding a product and/or service, particular payment method and the price or terms of this
- n) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations
- o) To enforce or apply our website terms of use, our terms and conditions or other contracts, our intellectual property, or to protect our (or our customers' or other people's) rights, property and safety
- p) To exercise our rights, to defend ourselves from claims
- q) To take part in, or be the subject of, any sale, purchase, merger, takeover or reorganization of all or part of our business.

4. **Where you have provided your consent** to the processing of your personal data for one or more specific purposes including::

- a) For some direct marketing communications
- b) For some of our profiling and other automated decision making
- c) For recruitment purposes

5. As set out in our **separate GDPR Privacy Notice for Staff**, which covers all permanent, fixed term, temporary, consultants and contractors.

7. When do we share your personal information with other organisations?

We may share information with third parties for the purposes listed above including:

- SPI Lasers Group companies if appropriate (e.g. where a purchase has been made by a European company for a US based subsidiary)
- Business partners (for example, distributors and /or machine builders) where this is necessary to provide you with a product or service
- Companies or other organisations that we have engaged to provide services on our behalf such as web-hosting companies, mailing vendors, analytics providers, event hosting services, information technology providers, Freight forwarders and shipping agents

- Companies or other organisations where you have asked us to or agreed that we may share your personal information with them
 - Governmental and regulatory bodies such as HMRC, the Information Commissioner's Office, Customs authorities, and export control authorities
 - Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
 - Credit Reference and Fraud Prevention Agencies (see below)
 - As set out in our separate GDPR Privacy Notice for Staff
 - Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues; or
 - any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Policy.
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8. What are your marketing preferences and what do they mean?

We may use your business or home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us using the details below or by following the instructions in the communication.

9. How we look after your data

We use a variety of technological and operational security measures to protect your information against any unauthorised access to, unlawful use of, and modification and destruction of any personal data we store.

10. How and when can you withdraw your consent?

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below or click 'unsubscribe' on any marketing emails sent directly to you.

11. Is your personal information transferred outside the UK or the EEA?

We're based in the UK but sometimes your personal information (contact name, email & telephone number) may be transferred outside the European Economic Area. If we do so we'll make sure that suitable safeguards are in place.

12. How do we share your information with credit reference agencies?

To process your application, we'll perform credit and identity checks on your company with one or more credit reference agencies (**CRAs**). To do this we'll supply your company's name and potentially the names of directors to CRAs and they will give us information about you. This will include information from your credit application and about your financial



situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We'll use this information to:

- Verify the accuracy of the data you have provided to us
- Prevent criminal activity, fraud and money laundering
- Manage your account(s)
- Assess payment methods available to you
- Trace and recover debts

We'll continue to exchange information about you with CRAs while you have a relationship with us. We'll also notify the CRAs about your settled accounts. If you don't repay in full and on time, CRAs will record the outstanding debt. This information may be given to other organisations by CRAs.

13. What should you do if your personal information changes?

You should tell us so that we can update our records using the details in the Contact Us section of our website. We'll then update your records.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

14. Do you have to provide your personal information to us?

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

15. Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

16. What about other automated decision making?

We sometimes make decisions about you using only technology, where none of our employees or any other individuals have been involved. For instance, we may do this to decide whether to message you about a specific product or service. We may also do this using data from other parts of the SPI Lasers Group, including product or service details (including usage of them or claims made) and company size, location or turnover.

We'll do this where it is necessary for entering into or performing the relevant contract, is authorised by laws that apply to us, or is based on your explicit consent.

17. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
 - For as long as we provide goods and/or services to you including warranty and after sales services, and then for as long as someone could bring a claim against us; and/or
 - Retention periods in line with legal and regulatory requirements or guidance.
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18. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not.

- The right **to be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right **to object** to processing of your personal information
- The right **to restrict processing** of your personal information
- The right **to have your personal information erased** (the "right to be forgotten")
- The right to **request access** to your personal information and to obtain information about how we process it
- The right to **move, copy or transfer your personal information** ("data portability")
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

19. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the **Contact Us** section of our website to exercise these rights.



Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPC, you can contact us by going to the **Contact Us** section of our website. Alternatively, you can write to SPI Lasers UK Ltd, 6 Wellington Park, Tollbar Way, Hedge End, Southampton, SO30 2QU, United Kingdom, marking it for the attention of the DPC.

Complaints

If you have any concerns about the way in which we are using your personal information, please contact our Data Protection Coordinator in the first instance and we will endeavour to resolve your concern. However, you do also have the right to complain about how we treat your personal information to the Information Commissioner's Office ("ICO"). The ICO can be contacted at:

ICO website: <https://ico.org.uk/global/contact-us/>

ICO telephone: **0303 123 1113**

ICO textphone: **01625 545860**
