

# Privacy notice

## HOW BODYCOTE USES AND MANAGES YOUR DATA

The Bodycote entity responsible for your personal information will be the member of the Bodycote plc group that originally collects information from or about you.

You can find out more about members of the Bodycote plc group at [www.bodycote.com](http://www.bodycote.com) or by contacting us using the information in the Contact Us section below. Bodycote plc and its affiliates (collectively referred to as "Bodycote", "we", "us") takes its data protection and privacy responsibilities seriously. This privacy notice explains how we collect, use and share personal information in the course of our business activities, including:

- what personal information we collect and when and why we use it
- how we share personal information within Bodycote and with our service providers, regulators and other third parties
- explaining more about processing shareholder personal information
- explaining more about Direct Marketing and Profiling
- transferring personal information globally
- how we protect and store personal information
- legal rights available to help manage your privacy
- how you can contact us for more support

We may amend this notice from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check [www.bodycote.com](http://www.bodycote.com) for the latest version of this notice. You might find external links to third party websites on our website. This privacy notice does not apply to your use of a third party site.

## WHAT PERSONAL INFORMATION WE COLLECT AND WHEN AND WHY WE USE IT

In this section you can find out more about

- the types of personal information we collect
- when we collect personal information
- how we use personal information
- the legal basis for using personal information

### When we collect information

We collect information about you if you:

- invest in our shares or are interested in investing in our shares
- register with or use one of our website(s) or online services
- purchase one of our services
- work with us as a business partner,

collectively ("**you**")

## Personal information we collect and use if you invest in our shares or are interested in investing in our shares

- your identity information and contact information
- your shareholding information

## Personal information we collect and use if you use our websites or online services

- your identity information and contact information
- information you input into any forms
- details of your use of the websites and online services

## Personal information we collect and use if you purchase one of our services

- your identity information and contact information
- bank account information and credit card information

## Personal information we collect and use if you work with us as a business partner

- your identity information and contact information
- bank account information and credit card information

## The legal basis for using your personal information

We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- you have provided your consent to us using the personal information
- our use of your personal information is in our legitimate interest as a commercial organisation - in these cases we will look after your information at all times in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained below
- our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you
- our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have

## SHARING PERSONAL INFORMATION WITHIN BODYCOTE, WITH OUR SERVICE PROVIDERS, WITH OUR REGULATORS

In this section you can find out more about how we share personal information:

- within Bodycote
- with third parties that help us provide our products and services
- with our regulators

We share your information in the manner and for the purposes described below:

1. within Bodycote, where such disclosure is necessary to provide you with our services or to manage our business
2. with third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us
3. with credit reference agencies and organisations working to prevent fraud in financial services
4. with our regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies

5. we may share in aggregate, statistical form, non-personal information regarding the visitors to our website, traffic patterns, and website usage with our partners, affiliates or advertisers
6. if, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business or assets

## **EXPLAINING MORE ABOUT PROCESSING SHAREHOLDER PERSONAL INFORMATION**

As a Bodycote shareholder, we process your personal information in connection with your shareholding. We hold personal information on registered shareholders, beneficial holders, legal representatives, past shareholders with unclaimed assets and dissentient shareholders.

The basis on which we do so is set out below.

### **Company secretariat**

#### **What processing activities do you undertake that include my personal information?**

We administer and manage your shareholding with the Company and maintain the general records necessary to do so. This includes the administrative and management activities that we undertake with respect to governance requirements, for example:

- Maintaining statutory registers
- Managing compliance with registrations and government agencies
- Complying with statutory reporting requirements

#### **What categories of personal information are included in these processing activities?**

We process your identity information and contact information and other information which may be required in certain jurisdictions.

#### **What is the reason for these processing activities?**

We use your personal information to manage our relationship with you and to administer your shareholding.

#### **What are the legal grounds you rely on to carry these out?**

This processing is necessary for the compliance with legal obligations to which the Company is subject. This processing is also necessary for the purpose of the legitimate interests pursued by the Company.

#### **What are the 'legitimate interests' referred to above?**

The Company considers that it has a legitimate interest in operating its business and managing the information of its shareholders. This includes complying with statutory reporting requirements and compliance obligations for overseas registrations and government agencies.

#### **Who do you share this personal information with?**

Your personal information is shared internally within Bodycote at a senior level. In addition, some of your personal information will be shared externally with company registries (such as Companies House in the UK), legal advisers, auditors, Company Secretarial providers, notaries and as otherwise set out in this Notice.

## Share registers

### What processing activities do you undertake that include my personal information?

We administer and manage the Bodycote share register and additional share registers.

### What categories of personal information are included in these processing activities?

We process your identity information and contact information and share information.

### What is the reason for these processing activities?

We use your personal information to manage our relationship with you and to administer your shareholding. We do this to administer the share register effectively and ensure that shareholders receive the benefits and rights that they are legally entitled to.

In addition, we use this information to respond to queries relating to shareholdings and/or unclaimed assets. Further, we analyse the share register for reporting and other purposes, including AGM attendance and voting.

### What are the legal grounds you rely on to carry these out?

This processing is necessary for the compliance with **legal obligations** to which the Company is subject. This processing is also necessary for the purpose of the **legitimate interests** pursued by the Company.

### What are the 'legitimate interests' referred to above?

The Company considers that it has a legitimate interest in operating its business and managing the information of its shareholders. This includes complying with statutory reporting requirements and compliance obligations for overseas registrations and government agencies.

### To the extent that you did not get this personal information from me, how did you collect this information?

We may receive personal information from share / stock brokers, your agent or representative, share nominees/custodians, share plan administrators/trustees and companies (or their registrars) who are the subject of any takeover/merger and from other sources as set out in this Notice.

In addition, we may also gather some personal information from publicly available sources.

### Who do you share this personal information with?

Your personal information is shared internally, as set out in this Notice.

In addition, some of your personal information will be shared externally with the Share Registrar, Equiniti (see <https://privacy.equiniti.com> for details of Equiniti's own Privacy Statement applicable to the information they hold), with company registries (such as Companies House in the UK), analysts, legal advisers, auditors, Company Secretarial providers, notaries, asset tracing companies, print and mail house, and as otherwise set out in this Notice.

## EXPLAINING MORE ABOUT DIRECT MARKETING AND PROFILING

In this section you can find out more about

- how we use personal information to keep you up to date with our products and services
- how you can manage your marketing preferences
- when and how we undertake profiling and analytics

## How we use personal information to keep you up to date with our services

The We may use personal information to let you know about Bodycote services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful. In all cases, we will respect your preferences for how you would like us to manage marketing activity with you.

## How you can manage your marketing preferences

To protect privacy rights and to ensure you have control over how we manage marketing with you:

- we will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you
- you can ask us to stop direct marketing at any time
- you can change the way your browser manages cookies, which may be used to deliver online advertising

## When and how we undertake profiling and analytics

[www.bodycote.com](http://www.bodycote.com) uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses cookies to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may opt out at any time by blocking the google analytics cookie in your browser.

## TRANSFERRING PERSONAL INFORMATION GLOBALLY

In this section you can find out more about:

- how we operate as a global business and transfer data internationally
- the arrangements we have in place to protect your personal information if we transfer it overseas

Bodycote operates on a global basis. Accordingly, your personal information may be transferred and stored in countries outside the EU, including in North America and Asia, that are subject to different standards of data protection. Bodycote will take appropriate steps ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangement are in place to protect your privacy rights. To this end:

- we ensure transfers within Bodycote will be covered by an agreement entered into by members of Bodycote (an intra-group agreement) which contractually obliges each member to ensure that personal information receives an adequate and consistent level of protection wherever it is transferred within Bodycote
- where we transfer your personal information outside Bodycote or to third parties who help provide our services, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of personal information transferred from within the EU to the United States
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed

You have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

## HOW WE PROTECT AND STORE YOUR INFORMATION

### Security

We have taken steps to implement and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorised disclosure or access to such information appropriate to the nature of the information concerned. Measures we take include placing confidentiality requirements on our staff members and Service Providers; destroying or permanently anonymising personal information if it is no longer needed for the purposes for which it was collected. As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect User IDs and passwords please take appropriate measures to protect this information.

### Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting requirements.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

## LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information as set out below.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

### Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

### Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected
- you have withdrawn your consent (where the data processing was based on consent)
- following a successful right to object (see right to object)
- it has been processed unlawfully
- to comply with a legal obligation to which Bodycote is subject

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation

- for the establishment, exercise or defence of legal claims

### Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy
- the processing is unlawful, but you do not want it erased
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims
- you have exercised the right to object, and verification of overriding grounds is pending

We can continue to use your personal information following a request for restriction, where:

- we have your consent
- to establish, exercise or defend legal claims
- to protect the rights of another natural or legal person

### Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you
- the processing is carried out by automated means

### Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

### Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes. You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

### Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union. We may redact data transfer agreements to protect commercial terms.

### Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

## CONTACT US

The primary point of contact for all issues arising from this privacy notice, is our Group Data Protection Officer. The Group Data Protection Officer can be contacted in the following ways:

- [gdpo@bodycote.com](mailto:gdpo@bodycote.com)
- c/o Bodycote plc, Springwood Court, Springwood Close, Tytherington Business Park, Macclesfield, Cheshire SK10 2XF

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact our Group Data Protection Officer or us. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

You have a right to lodge a complaint with your local data protecting supervisory authority (i.e. your place of habitual residence, place or work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before your local supervisory authority.