

1. How Bodycote Uses and Manages your Personal Data

- 1.1 The Bodycote entity responsible for your personal data will be the member of Bodycote plc group that originally collects information from or about you and will be the controller of your personal data. In addition, where processing of personal data is undertaken by other members of Bodycote plc group for their own independent purposes, these group members may be joint controllers of your personal data. You can find out more about members of the Bodycote plc group at 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 the "**Bodycote**", "**Company**", "**we**", "**us**") takes its data protection and privacy responsibilities seriously.
- 1.2 This Bodycote Privacy Notice ("**Notice**") explains how we collect, use and share personal data in the course of our business activities, including:
 - 1.2.1 what personal data we collect and when and why we use it
 - 1.2.2 purpose and legal bases for processing
 - 1.2.3 how we share personal data within Bodycote and with our service providers and regulators
 - 1.2.4 explaining more about direct marketing
 - 1.2.5 transferring personal data globally
 - 1.2.6 how we protect and store personal data
 - 1.2.7 legal rights available to help manage your privacy
 - 1.2.8 how you can contact us for more support
- 1.3 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.
- 1.4 Please regularly check www.bodycote.com for the latest version of this Notice. You might find external links to third party websites on our website. This Notice does not apply to your use of a third-party site.
- 1.5 If you have any questions regarding the processing of your personal data or if you believe your privacy rights have been violated, please contact the Group Data Protection Officer as follows:
 - 1.5.1 email gdpo@bodycote.com;
 - 1.5.2 telephone +44 (0) 1625 505 300
 - 1.5.3 c/o Bodycote plc, Springwood Court, Springwood Close, Tytherington Business Park, Macclesfield, Cheshire SK10 2XF

2. What personal data do we collect and when and why we use it.

2.1 When we collect information

We collect information about you if you:

- 2.1.1 invest in our shares or are interested in investing in our shares;
- 2.1.2 register with or use one of our website(s) or online services;
- 2.1.3 purchase one of our services; and
- 2.1.4 work with us as a business partner,
collectively ("**you**" or "**your**").

2.2 Personal Data we collect and use if you invest in our shares or are interested in investing in our shares

- 2.2.1 your identity information and contact information; and
- 2.2.2 your shareholding information.

2.3 Personal Data we collect and use if you use our websites or online services

- 2.3.1 your identity information and contact information;
- 2.3.2 information you input into any forms; and
- 2.3.3 details of your use of the websites and online services.

2.4 Personal Data we collect and use if you purchase one of our services

- 2.4.1 your identity information and contact information; and
- 2.4.2 bank account information and credit card information.

2.5 Personal data we collect and use if you work with us as a business partner

- 2.5.1 your identity information and contact information; and
- 2.5.2 bank account information and credit card information.

2.6 Personal data we collect indirectly

- 2.6.1 We may receive personal data 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.
- 2.6.2 In addition, we may also gather some personal data from publicly available sources.

3. Purpose and legal bases for processing

3.1 Processing personal data

- 3.1.1 Where applicable data protection laws require us to process your personal data on the basis of a specific lawful justification, we generally process your personal data under one of the following bases:
- 3.1.1.1 you have provided your consent to us using the personal data;
 - 3.1.1.2 the processing is in our legitimate interest as a commercial organisation (being those purposes described in the section below), except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;
 - 3.1.1.3 the processing is necessary for compliance with a relevant legal or regulatory obligation that we have; or
 - 3.1.1.4 the processing is necessary to perform a contract or take steps to enter into a contract with you.
- 3.1.2 We may on occasion process your personal data for the purpose of the legitimate interests pursued by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.
- 3.1.3 We may collect and process your personal data for various purposes, including:

Bodycote purpose for processing	Lawful basis	Data Recipients
<p>As a Bodycote shareholder, we process your personal data in connection with your shareholding. We hold personal data on registered shareholders, beneficial holders, legal representatives, past shareholders with unclaimed assets and dissentient shareholders.</p> <p>We process this information in order to administer and manage your shareholding with Bodycote and maintain the general records necessary to do so (including 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)</p>	<ul style="list-style-type: none"> i. This processing is necessary for compliance with legal obligations to which Bodycote is subject. ii. To the extent i is not applicable, the processing is necessary to perform the contract between you and us; and iii. To the extent i and ii are not applicable, the processing is necessary for the purpose of the legitimate interests pursued by us. We consider that we have a legitimate interest in operating our business and managing the information of our shareholders. This includes complying with statutory reporting requirements and compliance obligations for overseas registrations and government agencies. 	<p>Your personal data is shared internally within Bodycote at a senior level. In addition, some of your personal data 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.</p> <p>We may also share your information with our regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.</p>
<p>As a Bodycote shareholder, we process your identity information, contact information and additional share registers to administer and manage the Bodycote share register and additional share registers (including responding to queries relating to shareholdings and/or unclaimed assets and analysing the share register for reporting and other purposes, including AGM attendance and voting).</p> <p>We use your personal data 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</p>	<ul style="list-style-type: none"> i. This processing is necessary for the compliance with legal obligations to which we are subject. ii. To the extent i. is not applicable, this processing is necessary for the purpose of the legitimate interests pursued by us. We consider that we have a legitimate interest in operating our business and managing the information of our shareholders. This includes complying with statutory reporting requirements and compliance obligations for 	<p>Your personal data is shared internally, as set out in this Notice (para. 4). In addition, some of your personal data 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.</p>

Bodycote purpose for processing	Lawful basis	Data Recipients
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.	overseas registrations and government agencies.	
To provide you with our website and online services, while ensuring the security of such services. We also use website analytics to understand how our website is used.	<ul style="list-style-type: none"> i. We process this information in order to perform our contract with you and provide you with our website and online services. ii. In addition to the above, where required by law, we obtain your consent prior to collecting personal data using any cookies or other tracking technologies which are not essential for the service provided by our websites or apps. iii. To the extent ii. is not applicable, this processing is necessary for the purpose of the legitimate interests pursued by us. Where an exception to the consent requirement applies, we also have a legitimate interest in reviewing at an aggregated level how our products, services and website are used and where they can be developed to ultimately improve our offering. 	This data is shared internally, as set out in this Notice (para. 4). We may also share the data with Google analytics, to help analyse our website usage.
We may use personal data to let you know about Bodycote services that we believe will be of interest to you.	<ul style="list-style-type: none"> i. We will usually obtain your consent prior to providing you with marketing information. ii. To the extent your consent is not required, any the relevant marketing will be carried 	This data is shared internally, as set out in this Notice (para. 4).

Bodycote purpose for processing	Lawful basis	Data Recipients
	<p>out for the purposes of the legitimate interests pursued by us.</p>	
<p>We process personal data of customer representatives and business partners in order to register the legal entity and complete compliance checks. This information is also used to provide you with the services that you have requested and handling customer service queries and complaints.</p>	<ul style="list-style-type: none"> i. This processing is necessary to perform the contract between you and us. ii. This processing is necessary for compliance with legal obligations to which we are subject. In particular, compliance with laws relating to the prevention of money laundering, anti-bribery, fraud prevention, counter-terrorist financing, sanctions checks and any other such “know your client” checks. iii. Some of the processing is also necessary for the purpose of the legitimate interests pursued by us. We consider that we have a legitimate interest in operating our business and managing the information of our shareholders. This includes complying with statutory reporting requirements and compliance obligations for overseas registrations and government agencies. 	<p>This data is shared internally, as set out in this Notice (para. 4). We also share this data with</p> <ul style="list-style-type: none"> i. our service providers, to help us provide our services. This may include IT service providers, delivery agencies, etc. ii. credit reference agencies and organisations working to prevent fraud in financial services; iii. tax, government organisations and agencies, law enforcement, regulators, auditors and legal advisors, where necessary to comply with applicable laws; and iv. our regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.

4. How we share personal data within Bodycote, with our service providers and with our regulators

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

- 4.1.1 within Bodycote, where such disclosure is necessary to provide you with our services or to manage our business;
- 4.1.2 with third parties who help provide our products and services. These third parties have agreed to confidentiality restrictions and use any Personal Data we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us;
- 4.1.3 with credit reference agencies and organisations working to prevent fraud and financial crimes;
- 4.1.4 with our regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;
- 4.1.5 we may share in aggregate, statistical form, non-Personal Data regarding the visitors to our website, traffic patterns, and website usage with our partners, affiliates or advertisers;
- 4.1.6 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; and
- 4.1.7 Some of your Personal Data 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.

For more information on the recipients of your personal data as it relates to specific categories of processing activities, please refer to the table above (para. 3).

5. Explaining more about direct marketing and profiling

5.1 How we use personal data to keep you up to date with our services

We may use personal data to let you know about the 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.

5.2 How you can manage your marketing preferences

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

- 5.2.1 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;
- 5.2.2 you can ask us to stop direct marketing at any time; and
- 5.2.3 you can change the way your browser manages cookies, which may be used to deliver online advertising.

5.3 When and how we undertake website analytics

Our website, 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.

6. Transferring Personal Data Globally

- 6.1 Bodycote operates on a global basis. Accordingly, from time to time your personal data (including sensitive data / special categories of personal data) will be transferred to other members of Bodycote group to process for the purposes described in this Notice. These group members may be located within the European Union, North American, Asia and elsewhere in the world. Personal data may also be transferred to third parties, as set out above.
- 6.2 Bodycote will ensure that appropriate or suitable safeguards are in place to protect your personal data and that transfer of your personal data is in compliance with applicable data protection laws. Where required by applicable data protection laws, Bodycote has endeavoured to ensure that service providers (including other members of the Bodycote group) sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction over the relevant Bodycote exporter.
- 6.3 Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal data 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 data when this is transferred as mentioned above.

7. How we protect and store your Personal Data

- 7.1 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 employees and service providers; destroying or permanently anonymising personal data 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.

- 7.2 We will store your personal data 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 data 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 data 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 data or dealings.

8. Legal rights available to help you 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 data as set out below. We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal data 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. 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.

8.1 *Right to access, correct and delete your Personal Data*

- 8.1.1 The Company aims to ensure that all personal data are correct. You also have a responsibility to ensure that changes in personal circumstances (for example, change of address and bank accounts) are made known to the Company so that we can ensure that your personal data is up-to-date.
- 8.1.2 You have the right to request access to any of your personal data that the Company may hold, and to request correction of any inaccurate data relating to you. You furthermore have the right to request deletion of any irrelevant data we hold about you.

8.2 *Data portability / right to transfer your personal data*

Where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to us in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.

8.3 *Right to restriction of processing*

you have the right to restrict our processing of your personal data, but only where:

- 8.3.1 its accuracy is contested, to allow us to verify its accuracy
- 8.3.2 the processing is unlawful, but you do not want it erased
- 8.3.3 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

8.3.4 you have exercised the right to object, and verification of overriding grounds is pending

Where Personal Data is subjected to restriction in this way, we will only process it with your consent or for the establishment, exercise or defence of legal claims.

8.4 *Right to object to processing justified on legitimate interest grounds*

You can object to any processing of your personal data 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.

8.5 *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 data to unaffiliated third parties for the purposes of direct marketing or any other purposes.

8.6 *Right to withdraw consent*

Where you have provided us with your consent to process your personal data, you have the right to withdraw such consent at any time. You can do this by unsubscribing from the emails you receive from us, using the unsubscribe link, updating your preferences via your account settings, or rejecting cookies in your browser. You can also exercise this right by contacting us.

8.7 *Right to obtain a copy of personal data safeguards used for transfers outside your jurisdiction*

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

8.8 *Right to lodge a complaint with your local supervisory authority*

You also have the right to lodge a complaint with a supervisory authority, in particular in your country of residence, if you have concerns about how we are processing your personal data. 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.

For further information regarding your rights, or to exercise any of your rights, please contact the Group Data Protection Officer.

9. Contact Us

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

- gdpo@bodycote.com
- c/o Bodycote plc, Springwood Court, Springwood Close, Tytherington Business Park, Macclesfield, Cheshire SK10 2XF

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- 9.2 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 of 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.