



Swagelok Central UK

## Swagelok Central UK

### Privacy Policy

#### Privacy Policy

Bristol Fluid System Technologies Limited (also referred to as Swagelok Central UK) respects your privacy and is committed to protecting your personal data.

This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

In this privacy policy, we explain how we collect and use your personal information.

#### Information about who we are.

Bristol Fluid System Technologies Limited is a company registered in England and Wales (company number 7360187) with our registered office being 7 Orpen Park, Ash Ridge Road, Almondsbury, Bristol, BS32 4QD, we are an authorized Swagelok Sales and Service Centre serving Cornwall, Isle of Wight North-West and Midlands areas, including Manchester, Birmingham, Cumbria, and all of Wales. We are referred to and trade as Swagelok Manchester (collectively referred to as our “group” “we” or “us” in this policy).

Unless otherwise stated Bristol Fluid System Technologies Limited is the data controller for the purposes of the UK General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018 and any other data protection legislation applicable in the UK from time to time (data protection laws).

We are registered with the Information Commissioner under registration reference: ZA220185.

Details of how to contact us if you have any questions about privacy or data protection can be found below in the [Contact Details](#).

#### General Information

All personal data we collect or are provided with will only be held and stored in accordance with this policy and the data protection laws.

We must have a lawful basis to process your personal data, and this policy explains what our lawful basis is in respect of each purpose for which we keep and use information about you. Generally, we are allowed to process your personal data where it is necessary in connection with a contract between us (such as a contract to supply our products or services), where it is necessary in order for us to comply with our legal obligations, or where we have a legitimate interest to do so (but we will always consider whether your right to privacy overrides our interest).



Please note that links from our website may take you to external websites which are not covered by this policy. We recommend that you check their privacy policies before submitting any personal information to such sites. We will not be responsible for the content, function, or information collection policies of these external websites.

This website was created and continues to be managed by us and the Swagelok Company and, as such, they will process your data on our behalf when you visit our website. They will only use your data for the purposes outlined below. More information about Swagelok Company and how it processes personal data can be found at <https://www.swagelok.com/en/privacy-policy>.

We keep our privacy policy under regular review to make sure it is up to date and accurate.

## **What information do we collect about you and how do we collect it?**

We use different methods to collect information from and about you.

Personal information or personal data, means any information about an individual from which that person can be identified and is generally referred to throughout this Privacy Policy as “personal data”. It does not include data where the identity has been removed (anonymous data).

We collect personal data when you visit or contact us or when you request information from us or use the website you may be asked to provide information about yourself. We also collect information when you visit our premises, purchase products online, and / or when engage with us on social media.

You are not required (by law or by any contract with us) to provide personal data to us via our website. We will only require you to provide personal data to us where it is necessary for us to provide you with a service at your request. When you provide personal data to us, we will treat that information in accordance with this Privacy Policy.

## **Information you provide to us.**

This is information about you that you give us. We may receive information about you whenever you contact us. For example, we receive information and personal data when you:

- Enquire about our products or services.
- Enquire about supplying us with your products and services.
- Use and / or browse our website.
- Telephone, text, write by post or email us.
- Enquire about, or applying for, job vacancies.



- Tag or post on social media.

The information you provide may include the following:

- Normal identification information, such as your full name, date of birth, age, gender, marital status
- Contact information, such as your postal address, email address and telephone number
- Additional information relevant to your use of our site and services, such as your marketing preferences, survey responses and feedback
- Information about your shipment, including the recipient.
- Your VAT status (for international shipments)
- Payment information (this is securely collected and processed by our payment provider)
- In respect of job applications, your CV including details of your education and employment history (and any other information which you may choose to provide to us with your CV)

## **Information we collect about you.**

Personal data we may collect, use, store, and transfer about you, are as follows:

- Identity data, which includes your name, age/date of birth and gender.
- Contact data which includes postal address including billing and delivery addresses, your location, telephone numbers (including mobile numbers) and e-mail address.
- Transaction data which includes purchases and/or orders made by you and your payment card details.
- Technical data which includes your on-line browsing activities on our website.
- Profile Data which includes your account login details for website and/or apps including your username and password(s), your interests, preferences, feedback, and survey responses.
- Marketing and communications data which includes your marketing preferences from us and our third parties, your communication preferences, and your correspondence to and communications with us.
- information captured by our CCTV if you visit any of our premises; and
- other publicly available personal data, including any which you have shared via a public platform (such as an X feed or public Facebook page).



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This list is not exhaustive, and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you set up an on-line account on our website or send an email to our customer services team or via social media.

Other personal data is collected indirectly, for example you're browsing or shopping activity.

We may also collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources.



## **On-line account**

Some personal data and information is required to set up and register with an online account via Swagelok.com, including name, contact details, and email address.

We use your information to facilitate your orders, to enable a fast response to your request and improve our service to you. We may contact you when we need to verify your identity, follow-up with you or contact you as necessary. We may also use your information to match you to content that is associated with your interests and to direct you to additional resources and tools that can save you time. If you have consented, we may also use this information to send you our electronic newsletter, other information, and content.

## **Information we collect about you on our website and cookies.**

We collect information using cookies and other similar technologies to help distinguish you from other users of our website. These can streamline your online experience by saving you from re-inputting some information and allow us to make improvements to our website. For more information about how and why we use cookies, please look through our Cookie Policy.

When you visit our website, we may collect the following information:

- Which pages you view, and which links you follow.
- Your IP address and general location.
- Details of the hardware and software that you are using to access the site.
- Any passwords that you use on our website.
- If you choose to log in using a third party, we will record your login provider.
- If you choose to link your account to a third-party marketplace to import items for shipment, we will record the details necessary to facilitate that link.
- A device identifier (cookie or IP address) for fraud prevention
- Details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs, and other communication data.
- Where orders originate from advertising sources, we record the source of each order. This is purely to allow us to assess the effectiveness of these adverts and is not used for customer profiling of any kind.

Our website is not intended for children, and we do not knowingly collect data relating to children.



### **Information we collect about you from other sources.**

This is information we receive about you if you use any of the other third parties including other websites we operate or the other services we provide.

Sometimes you will have given your consent for other websites, services or third parties to provide information to us. We also may have partnered with third parties to make additional products and services available to you. Some of these products and services can be accessed online through the third-party websites.

We may collect information about you from other sources. This may include the following:

- Publicly available information, from sources such as Companies House and from the Electoral Roll.
- Information you have shared publicly, including on social media.
- If you apply for a job, we may collect information about your criminal record by obtaining a DBS check through an approved agency.
- Information from third party databases or data suppliers, such as credit reference agencies, including details about your home.
- Information we receive about you if you purchase goods, or request a quote from, another Swagelok entity in another territory, in which case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site.
- Information we receive from third party companies who assist us in developing project leads, for example My Protel.

This list is not exhaustive, and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

We sometimes combine information received from other sources with information you give to us and information we collect about you.

We will only use this information and the combined information where we have a lawful basis.

## **Payment card information**

Our chosen third-party provider may process your personal data to process any payments made for the provision of services. The information may include information for identification and verification, such as your name, credit, debit or other card number, card expiration date, and CVV code.

Any payment transactions carried out by us, or our chosen third-party provider of payment processing services will be kept secure and encrypted where possible.

## **If you fail to provide personal data**

Where we need to collect personal data by law, legitimate interest or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (for example, to provide you with goods and/or services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

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

We take data protection law seriously, so below we have set out exactly how and why we use your information, and what our legal basis is to be able to use your personal data in each way.

The lawful bases that we most commonly use to collect and process your personal information are:

- Where you have consented before the processing.
- Where we need to perform a contract, we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where there is a substantial public interest in processing information, for the purposes of detecting and preventing crime.

In certain circumstances, we need your personal data to comply with our contractual obligations or to pursue our legitimate interests in a way which might be reasonably expected as part of our running our business. For example, to deliver the services to you, we need to use the information you provide us to enable us to provide those services, please see [Supplying our products and providing our services](#).

Whenever you have given us your consent to use your personal information, you have the right to change your mind at any time and withdraw that consent. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

## **Supplying our products and providing our services**

It is necessary for us to use personal data about you to enter and perform the contracts that we make with you, such as when you become a customer. Using your information in this context is necessary so that we can:

- Provide you with information about your contract with us.
- Providing you with information about any warranty we provide to you.
- Provide you with information about our products and services.
- Verify your identity.
- Deal with any complaints you may have.
- Contact you about any changes that we make to our products or services; and
- Administer our website, including troubleshooting problems, analyzing statistics, conducting research and tests, and keeping the site secure.

If you enquire about, or apply for, a job vacancy, it is necessary for us to use your personal information as part of the recruitment process, to assess your suitability for a particular role.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your personal data to identify and tell you about our products or services. If you have given your consent to receive marketing emails you can withdraw this at any time, or if we are relying on our legitimate interests to send you marketing you can object. In either case, just let us know. If you have received a direct marketing email from us and no longer wish to do so, the easiest way to let us know is to click on the unsubscribe link at the bottom of our marketing emails.

We may contact you in relation to any similar products or services we think may be of interest to you or have previously supplied.

## **Making our business better**

We always want to offer the best products, services, and experience that we can. Sometimes this means we may use your personal data to find ways that we can improve what we do, or how we do it.

In this context, we will only use your personal data where it is necessary so that we can:





- Review and improve our existing products and services and develop new ones.
- Review and improve the performance of our systems, processes, and staff (including training); Improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- measure and understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

## **Contacting you**

We want to stay in touch with you. Sometimes we may need to use the personal data that we hold about you to respond to your questions or let you know about important changes.

We will only use your information in this respect where it is necessary so that we can:

- Interact and respond to any communications you send us, including where you use the Contact Us section, and any social media posts that you tag us in.
- Let you know about any important changes to our business or policies.

## **Verifying your identity**

We may use your personal data where it is necessary for us to do so to meet our legal obligations or to detect and prevent fraud, money-laundering and other crimes.

## **Protecting you and others from harm**

We may use your personal data where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality such as identity theft, piracy, or fraud.

## **Lawful bases overview**

The situations and occasions in which we will process your personal data are listed set out in the table below and indicate the purpose or purposes for which we are processing or will process your personal data.

	Perform Our Contract with You	Comply With Legal Obligations	Pursue Legitimate Interests
Verifying your identity		✓	✓
Deciding to supply our services	✓		
Administering the contract, we have entered with you	✓		
Administering the warranty, we have provided you	✓		
Dealing with any complaints you may have			✓
Logistics management and planning, including accounting and auditing		✓	
Deciding for the termination of our contract	✓		
Making repairs, alterations and improvements to the services supplied	✓	✓	✓
Dealing with legal disputes involving you		✓	✓
Complying with health and safety obligations	✓		✓
To detect and prevent fraud, money-laundering and other crimes		✓	
To review and improve the performance of our systems, processes, and staff (including training)			✓
To interact and respond to any communications you send us, including social media posts that you tag us in	✓		✓
To let you know about any important changes to our business or policies	✓		✓
To let you know about any similar products or services which we think may be of interest to you			✓
To ensure that the information that we hold about you is accurate and up to date	✓		✓
To protect your interests, or the interests of others (such as in the event of criminality such as identity theft, piracy, or fraud)		✓	



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## **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 we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal 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.

## **Who do we share your personal information with?**

### **Sharing your information within our company and group**

We may share your personal data with any member of our Group, which means our subsidiaries, our ultimate holding company, and its subsidiaries.

We will share your personal data within our Group so that we can provide you with the relevant services, which include where you act as a consumer or customer, or where you act in a business capacity as a supplier, retailer, or commercial contact.

We may disclose your personal data to members of our Group who are responsible for fulfilling the services or contracts you have entered.

Where we share the information that you provide to us with other companies within the Swagelok Group and other websites that we operate, this will sometimes involve transferring your data outside the United Kingdom, and specifically to our Group entities based in the USA.

Where we share your personal data within our Group, or to third parties and suppliers outside the UK, such as Europe and / or the USA, we have procedures in place to ensure your personal data receives the same protection as if it were being processed inside the UK. For example, our contracts with third parties stipulate the standards they must always follow.

Any transfer of your personal data will follow applicable laws and we will follow the guiding principles of this Privacy Policy.

### **Sharing your information with third parties**

We only ever share your personal information with trusted third parties.

We may share your data with selected third parties. We will never sell the personal data we collect.

The reasons we may share your personal data with third parties are:



- if we are under a legal or regulatory duty to do so, and / or
- if it is necessary to do so to enforce our terms of use, terms and conditions or other contractual rights.
- For example, we may share your information with our:
  - Internet hosting providers to host the website, related infrastructure, services, and applications; and / or
  - Contact management systems to send emails, instant messages, social media messages and SMS messages.
- There are certain circumstances in which we may disclose your personal data to third parties. This would be where we believe that the disclosure is:
  - Required by the law, or to comply with judicial proceedings, court orders or legal or regulatory proceedings.
  - Necessary to protect the safety of our employees, our property or where it is in the public interest.
  - Necessary for the prevention or detection of crime, including exchanging information with other companies or organizations for the purposes of fraud protection and credit risk reduction.
  - Proportionate as part of a merger, business, or asset sale, if this happens, we will share your information with the prospective seller or buyer involved.

## How long do we keep your personal data?

We will only store your personal data for as long as we need it for the purposes for which it was collected. Where we provide you with any service, we will retain any information you provide to us at least for as long as we continue to provide that service to you.

If you apply for a job vacancy (or otherwise send us your CV) we will retain your CV for a period of 12 months. If we are considering you for a particular role, we may retain this information for longer than that period.

Where you are provided with a lifetime warranty in relation to one of our products, we will retain your contact information (name, telephone number, email, address) for the duration of this warranty.

In all other circumstances, we will keep your information for a period of 3 years from the date of initial receipt of information.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for analytical or statistical purposes, in which case we may use this information indefinitely without further notice to you.

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

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

We try to ensure that all information you provide to us is transferred securely via the website. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

All information you provide to us is stored on ours and /third party secure servers.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

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. We ask you not to share a password with anyone.

## **What rights do you have in respect of your personal data?**

Your on-line account gives you access to your account settings and tools which allow you to access and control your personal data. By logging into your account and using your account settings, you can change and delete your personal information. For instance, you can edit or delete the profile data you provide.

You are also able to exercise your rights which include:

### **You have the right to be informed.**

We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal information and our use of it. We have written this policy to do just that, but if you have any questions or require more specific information, you can get in touch using [Contact Us](#) section of the website.

### **You have the right to access your personal data.**

You have the right to ask us to confirm whether we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your information.



- What categories of information we were using
- Who we have shared the information with.
- How long we envisage holding your information.

To maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold.

The first copy of your information that you request from us will be provided free of charge, if you require further copies, we may charge an administrative fee to cover our costs.

### **You have the right to correct any inaccurate or incomplete personal data.**

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case, you can contact us so that we can correct our records.

### **You have the right to be forgotten.**

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it)
- You object to us using your information and we have no overriding reason to keep using it
- We have used your information unlawfully.
- We are subject to a legal requirement to delete your information.

In those situations, you have the right to have your personal data deleted. If you believe one of these situations applies to you, please contact us.

### **You have the right to have a copy of your data transferred to you or a third party in a compatible format.**

Also known as data portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

If you would like us to transfer a copy of your data to you or another organization in a structured, commonly use and machine-readable format, please contact us. There is no charge for you exercising this right.

## **You have the right to object to direct marketing.**

You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please [contact us](#) or use the links provided in any of our marketing communications, and we will stop sending direct marketing immediately.

## **You have the right to object to us using your information for our own legitimate interests.**

Sometimes, we use your personal information to achieve goals that will help us as well as you. This includes:

- When we tell you about products or services that are like ones that you have already bought
- When we use you information to help us make our business better
- When we contact you to interact, communicate or let you know about changes we are making.
- We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

To exercise your right to object to our use of your data for the purposes above, please [contact us](#).

## **You have the right to restrict how we use your personal data.**

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the information we hold about you is inaccurate, and we have not yet been able to verify this.
- You have objected to us using your information for our own legitimate interests and we are in the process of considering your objection.
- We have used your information in an unlawful way, but you do not want us to delete your data; or
- We no longer need to use the information, but you need it for a legal claim.

If you believe any of these situations apply, please [contact us](#).



## **You have rights related to automated decision making and profiling.**

You have the right to not be subject to solely automatic decisions (i.e., decisions that are made about you by computer without any human input) in relation to any processes that have a legal or similarly significant effect on you.

Any automated decision-making or profiling we undertake is solely for the purpose of tailoring the information which we provide to you. We will not use automated decision-making or profiling to make any decisions which will have a legal effect upon you or otherwise significantly affect you, and you have the right not to be subject to such decisions. You will be notified if we make a solely automated decision which produces a legal effect or significantly affects you.

If you have any concerns or questions about this right, please [contact us](#).

When you request to exercise your rights

You will not have to pay a fee to exercise any of the rights listed above. However, we may charge a reasonable fee if your request is clearly unfounded or excessive, including where requests are repetitive. Alternatively, we could refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## **Changes to our Privacy Policy**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

Historic versions can be obtained by [contacting us](#).

## **Contact us:**

If you have any questions that haven't been covered or would like us to address any concerns about our use of your personal data, please do not hesitate to contact us by e-mailing [jennifer.hall@swagelokcentral.co.uk](mailto:jennifer.hall@swagelokcentral.co.uk) or call us on 01454 284455.

For further information on data protection please visit the Information Commissioner Office (ICO) website.

The Information Commissioner Office regulates data protection. If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal information, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113 or visit the website.







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You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the [ICO website](#) if you wish to lodge a complaint with the ICO.

Contact Details

**Post:** Marketing and Communications  
Swagelok Central UK  
7 Orpen Park, Ash Ridge Road  
Almondsbury  
Bristol  
BS32 4QD

**Email:** [jennifer.hall@swagelokcentral.co.uk](mailto:jennifer.hall@swagelokcentral.co.uk)

