

**PARAGON RAPID TECHNOLOGIES LIMITED****Website and General Privacy Policy**

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## Website and General Privacy Policy

This Website and General Privacy Policy Document (the “notice”, “Policy Document”) sets out how Paragon Rapid Technologies Limited, of Aviation Way, Durham Tees Valley Airport, Darlington, Durham, DL2 1NA, registered as a company in England and Wales with registration number **04858233**, and each of its strategic business units, Paragon Additive Manufacturing, Paragon Rapid Prototyping, and Paragon Rapid Engineering (**Paragon, the company, we, us, our**) is from time to time required to process the personal data of individuals (user, you, your) who contact us or use our websites, website Services (“The Portal”, “Instant Quote Service”, “Request a Quote Service”), website content and related features (collectively, our “Services”); or who attend our stand or meet with our representatives at tradeshows and events; or who attend our premises.

Should you have any questions regarding this Policy, please feel free to contact us on [info@paragon-rt.com](mailto:info@paragon-rt.com). Alternatively, you can visit our facilities at Aviation Way, Durham Tees Valley Airport, Darlington, Durham, DL2 1NA. Please arrange a visit via our Office Manager.

This policy document, together with our Website Terms and Conditions and any other documents herein, sets out our views and practices regarding your personal data and how we use it. By visiting our website and/or using our Services, you accept the processing of your personal data at the relevant levels described in this Website and General Privacy Policy, our Website Terms and Conditions, and any other related documents.

From time to time we may make changes to this and other Policy Document. Should such changes be made, we will inform you via our website or otherwise. By continuing to use our website and any of our Services after we have notified you of such changes amounts to your recognition and acknowledgement of the amendments we have made to the Policy Document.

Our Services are not intended for children under the age of 13. We do not knowingly collect, use or disclose personal data from or about visitors under 13 years of age. If you are under the age of 18, you must obtain the consent of your parent or guardian to use our Services and to provide us with your personal data.

This version of our Website and General Privacy Policy was published on 06 December 2018.

## Personal Data and its Definitions

“Personal data” refers to any information relating to an identified, or identifiable, person (the “data subject”) enabling that data subject to be identified, either directly or indirectly through alternative means. Personal data may include one, some or all of the following: name, address, email address, phone number, IP address, location data, cookies, call recording and similar information. Personal data may also include what is usually referred to as “special categories of personal data”, and occasionally referred to as “protected characteristics”, such as race, ethnicity, political opinion, religious or philosophical beliefs, trade union membership, health and sexual persuasion; and the processing of data utilised for the purpose of unique identification of a data subject, such as genetic and biometric data.

## What personal data is collected and processed by the Company?

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes title, first name, last name, username or similar identifier

- Contact Data includes billing address, delivery address, email address and telephone numbers
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of Services you have purchased from us]
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, Services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We collect this data in the following ways:

- Information provided by you: By filling in forms on our website, such as the contact form, the quote request form, the newsletter subscription form, the chat opening form, entering a contest, responding to our customer surveys, responding to promotional campaigns, engaging with us on social media, uploading information, sending us job applications and responding to the same, and corresponding with us by phone, email or letter or by any other means, you will be providing us with information about you.
- Third party information: In communication with us about our Services you may also provide us with personal information about others. This may be information about your work colleagues, your own service providers such as accountants, lawyers and auditors, and sources of referral.
- Information about your technology: Every time you visit our website or communicate with us via technological process, we may collect information about your technologies or devices, such as IP address, operating system, browser, time zone setting, the Internet address of the website from which you linked directly to our website, URL clickstream data, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- Information from third party sources: We may receive information about you from credit reference agencies, banks, shipping companies, our service providers and other third parties.

You do not have to provide us with this information. However, without it, we may not be able to supply you with our Services. We may also require credit reference agency information to process payments and before we enter into a service agreement with you. In addition, on occasion we are required to fulfil statutory obligations in terms of due diligence before we can provide a Service. To do this, we will require some personal information.

Information about third parties should only be provided if you have demonstrable permission to do so; or if the information is available in the public domain.

Any information that you provide us must be accurate, complete and up to date. By agreeing to our Terms and Conditions and the contents of this Policy Document, you are agreeing in return to ensure that this is the case.

#### How does Paragon Rapid Technologies use personal data?

Paragon Rapid Technologies only processes personal data where the law allows us to do so for the following purposes:

| <b>Purpose/Activity</b>   | <b>Type of data</b>   | <b>Lawful basis for processing including basis of legitimate interest</b>   |
|---|---|---|
| To register you as a new customer. This may be through our portal or at the point of enquiry  | (a) Identity<br>(b) Contact   | For our performance of a contract with you  |
| To process and deliver your order including:<br><br>(a) Manage payments, fees and charges<br><br>(b) Collect and recover money owed to us   | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications | (a) For our performance of a contract with you<br><br>(b) Necessary for our legitimate interests: to recover debts due to us<br><br>This point may include our website and related features, sale of Services, subscriptions and other Services, where we need to perform the contract we are about to enter into, or have entered into |
| To manage our relationship with you which will include:<br><br>Notifying you about changes to our terms or privacy policy<br><br>Contacting you regularly throughout the duration of your project to ensure we are performing our Services to expectations<br><br>Asking you to leave a review or take a survey | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Marketing and Communications                      | (a) Performance of a contract with you<br><br>(b) Necessary to comply with a legal obligation<br><br>(c) Necessary for our legitimate interests: to keep our records updated and to study how customers use our Services  |
| To enable you to partake in a special offer, a prize draw, competition or complete a survey   | (a) Identity<br>(b) Contact<br>(c) Profile  | (a) Performance of a contract with you<br><br>(b) Necessary for our legitimate interests: to study how customers use our Services, to develop them and grow our business  |

|  |  |  |
|--|--|--|
|  | (d) Usage<br>(e) Marketing and Communications  |  |
| To administer and protect our business and this website: including handling of complaints, quality assurance processing, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data | (a) Identity<br>(b) Contact<br>(c) Technical   | (a) Necessary for our legitimate interests: for running our business, provision of administration and IT Services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise<br><br>(b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you   | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications<br>(f) Technical | Necessary for our legitimate interests: to study how customers use our Services, to develop them, to grow our business and to inform our marketing strategy  |
| To use data analytics to improve our website, Services, marketing, customer relationships and experiences  | (a) Technical<br>(b) Usage   | Necessary for our legitimate interests: to define types of customers for our Services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy  |
| To make suggestions and recommendations to you about Services that may be of interest to you   | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile<br>(f) Marketing and Communications | Necessary for our legitimate interests: to develop our Services and grow our business. You have the right to unsubscribe by email to <a href="mailto:info@paragon-rt.com">info@paragon-rt.com</a> , or via our website delivery service.   |
| To enable other suppliers and service providers to carry out certain functions on our behalf in order to provide the Services  | (a) Identity<br>(b) Contact<br>(c) Technical   | Necessary for our legitimate interests: these include, but are not limited to, webhosting, data storage, identity verification, technical, logistical and other functions, as applicable   |

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| <p>To enable you to use our website features, such as our chat box and portal, when you choose to do so</p> | <p>(d) Usage<br/>(e) Profile<br/>(f) Marketing and Communications<br/>(a) Identity<br/>(b) Contact<br/>(c) Technical<br/>(d) Usage<br/>(e) Marketing and Communications</p> | <p>Necessary for our legitimate and mutual interests: to enable us to deliver information to you, to advise you of our services and to enter into a contract with you, as applicable</p>   |
| <p>To publish marketing materials</p>   | <p>Identity<br/>Usage</p>   | <p>Necessary for our legitimate interest: with your express permission, such as User testimonials and case studies. If at any point you wish for us to remove your testimonial from our marketing materials, you may do so by contacting us at <a href="mailto:info@paragon-rt.com">info@paragon-rt.com</a></p>  |
| <p>To contact third parties</p>   | <p>(a) Identity<br/>(b) Contact<br/>(c) Technical<br/>(d) Usage<br/>(e) Marketing and Communications</p>  | <p>Necessary for our legitimate interest and mutual interest: sending marketing communications to a friend referred by you, either via email marketing processes or by post, or through direct contact</p>   |
| <p>Connecting you to third party features, such as social media and our portal</p>                          | <p>(a) Identity<br/>(b) Contact<br/>(c) Technical<br/>(d) Usage<br/>(e) Marketing and Communications</p>  | <p>Necessary for our legitimate interest: Our Website includes a range of social media features, such as the Twitter, LinkedIn, Facebook and Google+ share panels. Our portal is also managed by a third party. These features may collect your IP address or the page you are visiting on our site and may set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy statements of the companies providing them.</p> |
| <p>To comply with applicable law</p>  | <p>(a) Identity<br/>(b) Contact</p>   | <p>In our legitimate interest: including responding to lawful requests from</p>  |

|  |  |   |
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|  | (c) Technical<br>(d) Usage<br>(e) Marketing and Communications | authority organisations such as the police, a court or regulatory body. |
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## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Your contact details obtained during the course of our work in the field or at your offices may be passed to our marketing department for inclusion in our mailing list and to enable you to receive personalised marketing communications highlighting Services of relevance (points 1, 2, 3, 6, 8 above). You can opt out of these at any time by clicking 'unsubscribe' in the header or footer of our email, or by emailing us at [info@paragon-rt.com](mailto:info@paragon-rt.com) at any time.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

### Third party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, warranty registration, service experience or other transactions.

## Cookie Statement

**What are cookies?** In order to collect the information, including personal data as described in this Policy, we may use cookies and similar technology on our website. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. Cookies can be first party, i.e. cookies that the website you are visiting places on your device, or third-party, i.e. cookies placed on your device through the website but by third parties, such as, Google. For more information please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

- The cookies placed on our website We may use some or all of the following cookies on our website:
- Strictly necessary/first party cookies. These cookies are essential in order to enable you to move around our website and use its features. We cannot provide the Services you have asked for without them. They are deleted when you close the browser.
- Performance cookies. These are anonymous information collectors and inform us of how visitors use our website. They enable us to count the number of visitors to our site, to see how they use it, and how they move around it. They also allow us to see where, approximately, our visitors are from. These are first party cookies. For example, this website uses Google Analytics to help analyse how Users use the website. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information is then used to evaluate Users' use of the website and to compile statistical reports on website activity for the Group.
- Functionality cookies. These cookies allow our website to remember choices you make and to provide you with enhanced, more personal features. The information collected is usually anonymous, and they do not track your browsing activity on other websites.
- Targeting or advertising cookies. These enable us to deliver relevant information to you, aligned with your interests. They are used to limit the number of times you see an advertisement and enable us to analyse advertising effectiveness. They remember that you have visited our website and may help us in compiling your profile. These are persistent cookies which will be kept on your device until their expiration or earlier manual deletion.
- Social Media cookies. These cookies allow you to connect with social media networks such as Twitter, LinkedIn and Google+. These are persistent cookies which will be kept on your device until their expiration or earlier manual deletion.

Other cookies and similar technologies from time to time.

We may combine information from these types of cookies and technologies with information about you from other sources.

- Cookie consent and opting out. By using our Services, we assume that you are happy for us to place cookies on your device. Most Internet browsers automatically accept cookies. However, if you wish to withdraw your consent at any time, you can do so by modifying your browser setting. In declining to accept cookies, you may not be able to fully utilise the interactive features of our website or our Services platforms such as the portal.

You may opt-out from third party cookies by selecting appropriate options on <http://www.youronlinechoices.com/uk>.

#### Disclosure of personal data

There are circumstances where we may share your personal data with the parties set out below for the purposes set out in the table above:

- Other business units in our Group, such as Paragon Additive Manufacturing, Paragon Rapid Prototyping and Paragon Rapid Engineering;



- Rarely, we may share your data with specific suppliers and service providers. This is to facilitate the provision of our Services, including webhosting, identity verification (in order to verify your identity against public databases), customer Services, job application portal, payment platform, analytics, and consultants who may be engaged to protect the security or integrity of our business, including our databases and systems and for business continuity reasons;
- In circumstances subject to appropriate legal basis such as consent, such as our marketing communications service suppliers who supply partners who enable us to deliver personalised ads to your devices, They may also contact you by post, email, telephone, SMS or by other means;
- A payer, such as your employer or principal, who pays for our Services;
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy;
- Public authorities where we are required by law to do so; and
- Other third parties where you have provided your consent.

#### International transfer of your personal data

We may share your data with third party companies outside the EEA (European Economic Area) for further processing and to complete your order of our Services. Your personal data may be transferred across our group of companies or to our Chinese production facilities. In such instances we ensure that appropriate transfer mechanisms, such as [standard contractual clauses](#), are in place safeguard data protection levels.

If we do transfer personal data abroad to our service providers and auxiliaries, we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means. You may contact us for a copy of such safeguards in these circumstances.

#### Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

#### Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a

complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are [available in our retention policy which you can request from us by contacting us.

Please be aware that the transmission of information via the internet is never completely secure. Whilst we can do our best to keep our own systems secure, we cannot control the whole of the internet and we cannot therefore guarantee the security of your information as it is transmitted to and from our website.

Where you have created or received a password or verification link which enables you to access certain parts of our website or content, you are responsible for keeping such information confidential. We ask you not to share such information with anyone.

#### Data subject rights

Data subjects may have numerous rights in relation to their personal data. For further information about your data protection rights please visit the ICO [website](#).

- **Right to make a subject access request (SAR).** Data subjects may request in writing copies of their personal data. Please note, compliance with such requests is subject to certain limitations and exemptions and the rights of other individuals. Each request should make clear that a SAR is being made. You may also be required to submit a proof of your identity and any payment permitted by law, where applicable
- **Right to rectification.** Data subjects may request that we rectify any inaccurate or incomplete personal data
- **Right to withdraw consent.** Data subjects may at any time withdraw their consent to the processing of their personal data carried out by us on the basis of their previous consent. Such withdrawal will not affect the lawfulness of processing based on previous consent.
- **Right to object to or restrict the processing of your data, including automated processing and profiling.** Profiling may be carried out for business administration purposes, such as monitoring trends in User visits of our website and in order to deliver relevant marketing communications to Users' devices. We will comply with valid objection requests unless we have a compelling and overriding legitimate grounds for continuing to process the data, or we have another lawful reason to refuse such request. We will comply with each valid opt-out or similar request in relation to marketing communications.
- **Right to deletion.** Data subjects may ask that we delete their personal data. We will comply, unless there is a lawful reason for not doing so such as statutory business record retention obligations with which we must comply by law.
- **Right to lodge a complaint with the supervisory authority.** We suggest that data subjects contact us about any questions or complaints in relation to how we process their personal data. However, each data subject has the right to contact the relevant supervisory authority directly.

### Third party sites

Third party policies for related Services and offerings (such as AMFG, Instagram, YouTube Facebook, LinkedIn and other social media platforms) linked to or from our Services have their own privacy statements and policies. We do not have control over the policies or practices of participating merchants and other third parties and are not responsible for the privacy practices or contents of those sites. Please ensure you review their policies before you provide any personal data or complete any transaction with them.

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