

## Oxford Instruments PLC

### WEBSITE PRIVACY STATEMENT

This website is brought to you by Oxford Instruments plc and its subsidiaries (“we” or “us”).

We respect your privacy and are committed to protecting your personal data.

This privacy statement tells you how we look after your personal data when you visit our website (regardless of where you visit it from), confirms your privacy rights and summarises how UK law protects you.

Please use the Schedule to understand the meaning of some of the terms used below.

#### **Purpose of this privacy notice**

This privacy statement aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through it when you sign up to our newsletter, purchase a product or service, take part in a competition, complete a contact support form, request pricing or a quote, download an asset.

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

It is important that you read this privacy statement together with any other privacy notice, policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This privacy statement supplements the other notices and is not intended to override them.

#### **Who controls and/or processes your data**

Oxford Instruments plc is made up of different legal entities, details of which can be found here: <https://www.oxinst.com/corporate-content/regulatory-information>

This privacy statement is issued on behalf of the Oxford Instruments Group so when we mention “Oxford Instruments”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the Oxford Instruments Group responsible for processing your data.

Oxford Instruments plc is the data controller for this website. We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy statement. If you have any questions about this privacy statement, including any

requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

## Personal data we may collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes credit reference agencies, bank account and payment card details received at the point of transaction.
- **Transaction Data** includes details of products and services you have purchased from us and other details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, operating system and platform.
- **Profile Data** includes your username and password, purchases or orders made by you, feedback and survey responses, your interests and preferences that you have provided.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used only in accordance with this privacy statement.

We do not collect any **Special Categories** of Personal Data about you (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## Cookies

We may monitor your use of this website through the use of cookies and similar tracking technologies. For example, we may monitor how many times you visit, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users and provide more relevant information for our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. You will still be able to purchase products and/or services.

We and third parties such as Google, use cookies or other third party identifiers to compile data regarding our advertisements. We may also use remarketing to advertise across other websites. For example, Google will show our advertisements across other websites that you are visiting based on your past visits to our website to ensure you receive advertisements that are relevant to you.

Please refer to the [Google Advertising Privacy Notice](#) and [Google's Ads Setting](#) page for more information about the ability to opt out.

For further information on our use of cookies, please see our [Cookie Policy](#).

## Law and Contract

Where we need to collect personal data by law, 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 into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service order you have with us but we will notify you if this is the case at the time.

## How we collect your personal data

We use different methods to collect data from and about you including:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [Cookie Policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - analytics providers;
    - advertising networks;
    - industry lead generators;
    - scientific publishers and social networking providers;
    - customer relationship management providers;
    - academic societies;
    - webinar providers;
    - search information providers;
    - survey engines;
    - event ticketing and management providers;
    - web and email marketing providers;
    - product comparison websites; and
    - sales and marketing automation platforms.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Identity and Contact Data from data brokers or aggregators.
  - Identity and Contact Data from publicly available sources such as Companies House, third party websites and the Electoral Register based inside the EU.

## How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into 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.

# Privacy Statement

Generally we do not rely on your consent as a legal basis for processing your personal data other than in relation to some direct marketing communications to you from ourselves and/or third parties – see below. You have the right to withdraw consent to that form of marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we can to use your personal data, and which of the legal bases permit us to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<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	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (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)

		(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 (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and 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 goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

## Marketing

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

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 products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

If we wish to share your personal data with any company outside Ol's group of companies for marketing purposes we will get your express opt-in consent before doing so.

## Opting out

You can ask us or third parties to stop sending you marketing messages at any time by checking or unchecking relevant boxes on any email we send to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

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

## Disclosure of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the Schedule;
- External Third Parties as set out in the Schedule;
- 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 statement;
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## Keeping your data secure

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.

We will use technical and organisational measures to safeguard your personal data.

In particular, we:

- use firewalls;
- encrypt payment details using SSL technology on certain of our websites that sell products and services online;
- restrict access to personal information to those who need to know that information in order to process it for us and who are subject to contractual confidentiality obligations; and
- require our employees to adhere to our data protection policy and our security policy.
- store your personal data on secure servers;

While we will use commercially reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you or to you via the internet.

## Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

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 requirements.

In some circumstances:

- you can ask us to delete your data: see below for further information;
- we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



## Monitoring

We may monitor and record communications with you (such as emails) for the purpose of quality assurance, training, fraud prevention and compliance.

## Credit checking

To enable us and other companies in our group to make credit decisions about you and the organisation(s) you work for, and for fraud prevention and money laundering purposes, we may search the files of credit reference and fraud prevention agencies (who will record the search).

We may disclose information about how you conduct your account to such agencies. Other credit grantors may use this information to make credit decisions about you and the organisations with whom you are financially associated, as well as for fraud prevention, debtor tracing and money laundering purposes. If you provide false or inaccurate information and we suspect fraud, we will record this.

## Information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her personal data;
- receive on his/her behalf any data protection notices; and
- give consent to the processing and transfer of his/her personal data abroad.

## Transfers of data out of the EEA

The data that we collect from you may be transferred to, and stored or processed at, a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing or processing. For example, we may use servers, website hosting partners, suppliers, agents, distributors and representatives and other parties who assist us in operating our website, conducting our business, or servicing you, who may be located outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **Request access to (and/or a copy of) your personal data** (commonly known as a "subject access request) to check its lawful processing;
- **Request correction of the personal data** that we hold about you to correct any incomplete or inaccurate data;
- **Request erasure of your personal data** where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law;
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing. You also have the right to object where we are processing your personal data for direct marketing purposes;
- **Request restriction of processing of your personal data** for example: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful (but you do not want us to erase it); (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- **Request the transfer of your personal data to you or to a third party** in a structured, commonly used, machine-readable format;
- **Withdraw consent at any time** to our processing your personal data, noting this will not affect the lawfulness of any processing carried out before you withdraw your consent and if you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

If you wish to exercise any of these rights, you should therefore:

- put your request in writing;
- include proof of your identity and address (for example, a copy of your driving licence or passport, and a recent utility or credit card bill); and
- specify the nature of your request, including any account or reference numbers where applicable.

If you wish us to stop processing your personal data for direct marketing purposes, you should:

- email us at [privacy@oxinst.com](mailto:privacy@oxinst.com) with a header that says 'Unsubscribe' or click the appropriate link in an email you have received from us;
- provide us with enough information to identify you; and
- if your objection is not to direct marketing in general, but to direct marketing by a particular channel (for example, email, mail or telephone) or from a particular Oxford Instruments business unit, please specify the channel or business unit you are objecting to.

If you receive emails from different product lines sold by different Oxford Instruments' business units, please use the opt-out functionality in each email to be sure you are unsubscribed from all.

## Third party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## Our contact details

We welcome your feedback and questions.

If you wish to contact us, please send an email to [privacy@oxinst.com](mailto:privacy@oxinst.com) or you can write to us at Attention: Group Data Privacy Manager, Tubney Woods, Abingdon, Oxon OX13 5QX, UK.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Changes to this statement and your duty to keep us up to date

We may change this Privacy Statement from time to time. You should check this Privacy Statement occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) before then as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## SCHEDULE

### THIRD PARTIES

#### INTERNAL THIRD PARTIES

Other companies in the Oxford Instruments Group acting as joint controllers or processors and] and provide IT and system administration services and undertake leadership reporting.

#### EXTERNAL THIRD PARTIES

- Service providers acting as processors and/or controllers.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Credit reference agencies, business partners, agents, distributors, representatives, partners, suppliers, service providers and marketing automation providers;

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.