

Privacy Notice

This privacy notice provides information on how Chromacity Limited, a private limited company with Company Number SC442724 (“**Chromacity**” or “**We**”), collects and processes your personal data collected from you through your interaction with this website: www.chromacitylasers.com (website) or when you otherwise communicate with us whether by telephone, email, at events or during the course of providing goods/services to your organisation. We may also collect personal data about you from publicly available sources and/or a third party who provides us with information about professionals and organisations that may be interested in our product(s).

Chromacity is the data controller and responsible for your personal data. If you have any questions about this privacy notice, our data protection practices or to make a subject data request, email: info@chromacitylasers.com.

1. What is Personal Data?

Personal Data: means any information relating to an identified or identifiable natural person (**‘data subject’**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Category of Data: means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

Chromacity does not store special category data.

2. What Personal Data is Chromacity Processing?

- Personal details (such as your name, e-mail address, telephone number and organisation you work for)
- How you use the website and any other information you post, email or otherwise send to us
- Your activity with our marketing communication e.g. if you open it, forward it, share it etc
- IP addresses collected via Cookies on our website - we may collect information where available about your IP (internet protocol) address, operating system and browser type. You can find out more about this in

3. Where did Chromacity obtain my Personal Data From?

We collect personal data from you:

- When you or your organisation use our services, buy our products or contact us to provide quotes or details of our products and services;
- When you or your organisation make an enquiry for our services or otherwise engage with our staff for business related purposes via the website or otherwise;
- When you attend a seminar or other event (including training) organised by Chromacity;
- When you visit Chromacity’s exhibition stand at an industry conference to make an enquiry;
- Where you sign-up to receive information from Chromacity via an online subscriber form or email;
- Where you or your organisation provide goods and/or services to us.

We collect personal data about you from the following sources:

- We may collect information from publicly available sources including: Companies House or Registers of Scotland, online research groups, university profiles and funding sites;
- We receive information from a third party that provides us with name, email and organisation of key contacts at organisations such as universities that may be interested in our products.

4. **Why is Chromacity Processing my Personal Data and what is the legal basis?**

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

Purpose/Activity	Type of Data	Lawful basis for processing
To respond to your enquiry and/or provide you with information about our products/services that you have enquired about.	Name, email, telephone, organisation	It is necessary for our legitimate interest in being able to respond to your enquiry.
To invite you to events we may be organising to promote our business.	Name, email, telephone, organisation	It is necessary for our legitimate interest to promote our business and part of this is running events and inviting key contacts.
To manage the delegate list at our events.	Name, email, organisation	<ul style="list-style-type: none"> • It is necessary to take steps at your request to enter into a contract with you. • To perform a contract with you
To identify relevant organisations that may be interested in our products and services and key contacts at those organisations and contacting them for this purpose.	Name, email, telephone, organisation.	It is necessary for our legitimate interest to create and manage a potential customer pipeline with a view to growing and sustaining our business model. Part of this involves processing personal data of key contacts at those organisations.
To send you our marketing communications about our products/services that you have signed up to receive.	Name, email.	Consent – you consent when you opt-in to receive our marketing information.
To improve our website we use analytical or performance cookies to understand how many visitors we receive and how those visitors are using the website.	IP address	Consent. Please see our Cookie Policy for further information.
To manage our relationship with you/your organisation in the event of a sale or in the negotiations of a sale.	Name, email, organisation, telephone number.	<ul style="list-style-type: none"> • It is necessary to take steps at your organisation’s request to enter into a contract with your organisation. • To perform a contract with your organisation.
To track your activity with our marketing communications e.g. when you open it, forward it, download it, complete any online form etc. This helps us understand if our marketing communication is being read and if they need tailored so we can provide more relevant content.	Usage information	It is necessary for our legitimate interest in providing good relevant content to our subscribers.

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.

5. Will my Personal Data be shared with any Other Organisation/Third Parties and if so, Why?

We will share your personal data with the following categories of suppliers: file hosting services, document management and storage and CRM system. All of our suppliers falling within these categories are located in the US meaning your personal data will be transferred to the US. We take your personal data seriously and our providers adhere to Standard Contractual Clauses (SCCs) with acceptable standards relating to the collection, use and retention of personal data received from the UK.

We may also share your personal data with other third parties that form part of our distribution network for the purposes of business development purposes and in order to support sales enquiries or product installations. Some of our distributors are located outside of the EEA and in such cases we shall take appropriate steps to ensure your personal data is transferred in accordance with the requirements of GDPR.

Other than the above, we would not share your personal data. An exception to this would be where we are required to share your personal data in accordance with law or any regulatory requirement to which Chromacity is subject or where we are undergoing a corporate restructure or M&A.

6. Is my Personal Data Safe?

Chromacity works hard to protect your personal data and have adopted appropriate technical and organisational measures to keep it safe from unauthorised disclosure, alteration or destruction. 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 personal data transmitted to Chromacity via the internet; any transmission is at your own risk.

7. How can I stop my personal data being used for marketing purposes?

You have the right to opt-out of receiving marketing communications at any time by:

- Contacting us at: info@chromacitylasers.com;
- Using the 'unsubscribe' link in footer of email campaigns and newsletters
- Responding to the email sender directly

If you ask opt-out of receiving marketing communications from us we will retain minimal information on our 'Do Not Contact List' so that we avoid sending you unwanted materials in the future.

You can also update your marketing preferences and supply more detail of the type of information you would like to receive from us, by accessing our preference centre displayed on the footer of email campaigns and newsletters.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

8. How long will Chromacity Retain my Personal Data?

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.

9. Does Chromacity make any Automated Decisions about Me or Profile my Personal Data?

Chromacity does not make automated decisions about you and also does not profile your personal data.

10. Third Party Links

Chromacity's website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy notices and that we do not accept any responsibility or liability for these notices or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these notices before you submit any personal data to these websites or use these services.

11. What are my Rights in Relation to the Personal Data Chromacity Holds About Me?

We have summarised your rights below. Please contact us at info@chromacitylasers.com to exercise these.

- If we are relying on your consent, you can withdraw your consent at any time, at which point we shall stop processing your personal data in that way. Please note this does not affect the legality of our processing up to the date of your withdrawal of consent.
- You can seek to restrict our processing of your personal data, ask us to rectify any personal data we hold about you or object to us processing your personal data where we are relying on legitimate interests or for the marketing purposes.
- You have the right to access personal data held by us about you.
- In certain circumstances you have the right to ask us to provide you with your personal data in a structured, commonly used and machine-readable format to allow you (or us on your behalf) to transmit this information to another party. More information can be found at <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/>
- In certain circumstances you have the right to ask us to erase the personal data we hold about you. Such circumstances include (a) where we no longer need your personal data for the purposes set out above; (b) if you withdraw your consent to our processing; (c) if you object to our processing based on our legitimate interest and we have no overriding legitimate grounds to continue processing your personal data; (d) if we process the data unlawfully; or (e) where the personal data has to be erased to comply with legal obligation to which we are subject. We will consider any such request in line with GDPR. Please note this is not an absolute right and there may be circumstances where we choose not to delete all of the personal data we hold about you. More information about your right of erasure can be found at <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>
- You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you think that we have infringed your rights. You can find more information about reporting a matter to the ICO at the following link: <https://ico.org.uk/make-a-complaint/>

12. Changes to Privacy Notice

We reserve the right to amend this privacy notice. However, any substantial changes in the way we store and manage your data will be communicated. Otherwise, smaller changes will be updated to this notice going forward.