# **Privacy Policy Notice**

The policy: This privacy policy notice is served by Petroleum Equipment International Middle East FZC under the website; www.pei-me.com. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information through the business and while you browse or use this website. If you do not agree to the following policy you may wish to cease viewing / using this website, and or refrain from submitting your personal data to us.

#### **Policy key definitions:**

- "I", "our", "us", or "we" refer to the business, [Petroleum Equipment International Middle East FZC].
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- Cookies mean small files stored on a users computer or device.

#### Key principles of GDPR:

Our privacy policy embodies the following key principles; (a) Lawfulness, fairness and transparency, (b) Purpose limitation, (c) Data minimisation, (d) Accuracy, (e) Storage limitation, (f) Integrity and confidence, (g) Accountability.

# Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- Lawful basis: Consent
   Where our purpose for processing is: to keep you informed about relevant products, offers and promotions
   Which is necessary because: it enables both of us to conduct business
   We process your information in the following ways: save in our customer relationship management CRM software and upload to a an automatic email messaging system.
- Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.
   Sharing your information: We do share your personal information with our customer relationship management and email messaging software providers for our internal use only.
- Lawful basis: Contract
   Where our purpose for processing is: to effectively perform contracted scope of work
   Which is necessary because: it is needed to deliver work that you contracted us to do.
   We process your information in the following ways: save in our customer relationship
   management CRM software, upload to a an automatic email messaging system, save in our
   jobs archiving system.
- Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.
   Sharing your information: We do share your personal information with our customer relationship management and email messaging software providers for our internal use only, and with third party organisations whose participation is necessary to perform the contracted work. For example, manufacturers, suppliers, legal consultants and freight forwarders.

•	Lawful basis: Legal obligation Where our purpose for processing is: maintain accurate records of business interaction
•	<ul> <li>and transactions</li> <li>Which is necessary because: it enables us to comply with applicable laws and regulations</li> <li>We process your information in the following ways: save in our customer relationship management CRM software, upload to a an automatic email messaging system, save in our jobs archiving system.</li> <li>Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.</li> <li>Sharing your information: We do share your personal information with third parties and they include applicable government agencies, such as tax and customs authorities.</li> </ul>
•	Lawful basis: Vital interests we do not store personal data under this purpose
•	Lawful basis: Public task we do not store personal data under this purpose
•	<ul> <li>Lawful basis: Legitimate interests</li> <li>Where our purpose for processing is: to keep you informed about relevant products, offers and promotions</li> <li>Which is necessary because: it enables legitimate marketing activity</li> <li>We process your information in the following ways: save in our customer relationship management CRM software and upload to a an automatic email messaging system.</li> <li>Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.</li> <li>Sharing your information: We do share your personal information with our customer relationship management and email messaging software providers for our internal use only.</li> </ul>
•	Lawful basis: Special category data we do not store personal data under this purpose .
•	Lawful basis: Criminal offence data we do not store personal data under this purpose

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

# Your individual rights

Under the GDPR your rights are as follows.

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

We handle subject access requests in accordance with the GDPR.

# **Internet cookies**

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third party website.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

Cookies that we use are;

- user preference cookie

# **Data security and protection**

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information.

### **Fair & Transparent Privacy Explained**

We have provided some further explanations about user privacy and the way we use this website to help promote a transparent and honest user privacy methodology.

#### Sponsored links, affiliate tracking & commissions

Our website does not contain adverts, sponsored and affiliate links.

### **Email marketing messages & subscription**

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences.

Our EMS provider is; [Mailchimp]. We hold the following information about you within our EMS system;

- Email address
- First Name
- Last Name
- Company
- Functional Focus
- Industry Segment
- I.P address
- Subscription time & date

v.1.0 Oct 2020 – Petroleum Equipment International Middle East FZC.