



## Privacy Notice & Data Protection Policy

### Introduction

Wogen recognises that in order to be a successful and valued partner to its customers, and a good employer, business must be conducted in a sustainable manner. This means respecting the Data Protection rights of those whose information we hold or process.

We act as a Data Controller and so have registered with the Information Commissioners Office (ICO) in the UK. The ICO are the Lead Supervisory Authority (LSA) for our worldwide activities – this means that if there is an issue with how we process data, they will be able to hold us to account.

Wogen trades minerals and metal for industry, hence usually we deal with other businesses – either suppliers of materials or purchasers of these goods. This policy explains how we use any personal information we collect if you work for us, are identifiable within the trading relationship or when you use this website.

### What private information does Wogen collect?

If you work for us, we will hold the personal information you supplied to allow us to set up this working relationship (your details, next of kin, beneficiaries, bank details, any work history or referencing information) as well as anything we have recorded while you worked with us (work, performance and disciplinary information, financial records etc). We use these to sustain the working relationship and keep them for as long as is necessary to demonstrate our compliance and keep required records.

We acknowledge that the normal process of business may include receiving, holding and sharing details on you if you work for or with companies we trade with. Typically, this will be your name, contact information and an association with this trade. We take and process information only where necessary as part of the agreed or potential trade contract. If your company give us your details, then they will have established why they have your agreement to do this (e.g. through your contract with them).

If you are a shareholder in a Wogen Group Company then we will hold contact information, information about the extent of your shareholding and a history of your engagement with the business. This information allows us to fulfil our legal duties to contact you and keep you informed at key times.

If you visit our web site, then we will take a small amount of tracking information through use of common logging technologies (this does not include cookies or other third party tracking technologies, a Cookies policy will be published on the site should this change). We will use this to understand how our web site is working. We would not normally attempt to link you (as a real person) to this visit. If you fill in a form on this web site to obtain further information or discuss your requirements, then we will take enough information to complete this request and use it for that purpose as well.



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### How do we use this information and for what purpose?

As a simple principle, we use information only for the purpose described above, which should be the purpose you would expect. We may retain information in records for longer than is necessary for the completion of a trade – this is to comply with our obligations to keep records and demonstrate that we have complied with the law or contract.

The Wogen Group of Companies does not share information outside this group other than to obtain professional advice or support. The Wogen Group of Companies does not include any businesses involved in personal data analysis or marketing.

### How and where do we store your information?

Information is held within the European Economic Area (EEA) for trades between EEA entities. If an EEA company concludes business with a Wogen subsidiary outside the EEA then information may be stored at that entity.

We store information only for as long as is necessary, but this may be well after we have finished actively using it, due to the need to keep appropriate records.

### What additional rights do I have?

We have provided this notice so that you are informed of how your information is used – if you have a question then please ask a and we will try to answer. You additionally have the right to:

- Access the information we hold about you
- Have anything that is wrong corrected
- Have us stop using information and/or information deleted

These rights are limited by the rights of others (so we would not be able to provide a copy of a document with your name on it without removing private or commercially confidential information about others first) and the provisions of any contract in place (so we cannot stop using your personal details while you remain the primary contact for a contracted trade or a current employee). We will not be able to make any changes which prevent us from keeping the records required of us (this may mean that deletion or correction does not cover all places where the information is stored) but will explain what this meant for you in writing.

Although the rights to data portability and objecting to processing are acknowledged, we do not believe that they are applicable in any cases where we hold data. Any request received will be considered on its own merits.

To make a request asserting one or more of these rights, please use the [contact us](#) form on the web site. Try to be as specific as possible about the nature and purpose of your request so that we can help you. We will require you to prove your identity before we can comply with any request made.

Wogen Group of Companies



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### Other Websites, Companies and Services

This policy covers the activity of the Wogen Group of Companies and wogen.com website. Any website linked from here is responsible for its own privacy policy and any organisation you have directed us to provide information to will not be covered this document.

### Changes to this policy

We will update this policy at <https://wogen.com/privacy-policy> to reflect changes should they be necessary from time to time.