

## Website Privacy Policy: SEWS-E

Whenever you visit this website we collect some personal information about you. This policy explains what we collect, the purposes for which we collect and use it, and what to do if you have a query or concern. The policy was issued on 26<sup>th</sup> September 2018. We will update it periodically to reflect any changes in our business, activities, or data protection law and will notify you of any change that may significantly affect you or your data protection rights.

### Your Personal Data; Our Legal Obligation

Data protection law requires that personal data is processed fairly, lawfully and for clearly specified purposes. The personal data must be fit for its intended purpose, accurate and not excessive, and must not be held for longer than necessary to fulfil that purpose. It must be used in a way that respects, and allows people to exercise, the rights they have over their personal data and it must be kept secure at all times. Personal data may be transferred freely within The European Economic Area ('EEA'), but it may only be sent to countries outside The EEA if it will receive the same level of protection there as it would within the EEA.

### Who is Collecting and Using Your Personal Data?

Your personal information is collected and used by Sumitomo Electric Wiring Services – Europe Limited ('SEWS-E'), and this is who we mean when we refer to 'we', 'us', or 'our' in this policy. We are part of the Sumitomo Electric Group, and you can find out more about our group, our parent company and our history at <http://www.sei.co.jp>.

In the UK, to comply with local data protection law, SEWS-E is registered as a 'Data Controller' with the Information Commissioner's Office (ICO) and details published on a public register, which can be viewed at <http://ico.org.uk>, where you will also find more information about data protection and how it applies to companies like SEWS-E.

### Definitions

In this policy, where we refer to '**Applicable laws**' or '**Data protection law**', we mean UK or European privacy or data protection legislation and regulation that applies to SEWS-E, principally **EU General Data Protection Regulation 2016/679 ('GDPR')** and any supporting or secondary local law or regulation in any of the countries in which we operate. By '**personal data**' or '**personal information**' we mean any information relating to an identified or identifiable individual located in the European Economic Area ('EEA') and UK. '**The EEA**' means the Member States of the European Union ('EU') plus Iceland, Liechtenstein and Norway.

### Collecting and Using Your Personal Data

Data protection law requires us to have a clear legal basis for collecting and using personal data. Although the personal data we collect and use via this website is very limited and the reason will often be self-explanatory, it is important that you know what we do with it and why, including our legal basis for each activity.

The legal bases that apply in the context of this website are principally that **you have given your consent** for us to use your personal data or that it is **in our legitimate interests as a business** to collect and use that data, subject to certain safeguards. On occasion, we may also need your personal data in order **to meet a legal obligation** or **to enter into a contractual relationship** with you. In the following section we explain briefly how these apply but you can find more information about data protection, including a detailed explanation of the acceptable legal bases for collecting and using personal data, on the European Commission website at <https://ec.europa.eu>, the UK ICO's website at <https://ico.org.uk> or, if you are in a country in the EU, on the website of your local data protection regulator.

### Information You Provide Directly

#### Queries and Requests for Information

Most of the personal data we collect when you visit our website is information you provide when submitting a query or request for information and is therefore collected and used with your consent. We use it only to provide you with the information you have asked for and to deal with your specific query.

Most enquiries through our website are of a commercial nature and made on behalf of current or potential customers or suppliers. Where necessary and proportionate, we may therefore use your personal data in connection with entering into, or providing services under, a contractual relationship between us, although in practice your personal data will typically be limited to name, role, company and business contact details.

#### Submitting Your CV

If you submit your CV through our site, we will hold it on file for 6 months and use it only to assess your eligibility and suitability for any vacancies that arise and to contact you about them. If you no longer wish us to do this, or

no longer wish us to use a particular method of contact, you can withdraw your consent easily at any time by e-mailing our HR team at [gdpr.enquiries@sews-e.com](mailto:gdpr.enquiries@sews-e.com).

Where applicable, your CV and any other information you have given us will be used in the recruitment and selection process and, if you are successful and join us as an employee, will then form the basis of your employee record. It will be handled in accordance with the SEWS-E data protection policy, which will be made available to you when you join us.

### Information We Obtain from Your Device

We aim to provide you with a website that is easy to use, informative and engaging, whether you are a customer, supplier, potential employee or just browsing. As well as benefitting you, it is in our [legitimate business interests](#) to have an effective website and understand how it is used. As we do this in a way that has minimal impact on your privacy, we are confident that we strike a fair and positive balance between our interests as a business and your rights as an individual visitor to the site.

To keep our website running smoothly and make it easy to use, we automatically collect some information from the device you use to access it, including details of the web browser and operating system you are running, the date and time of your visit, and the URL of the website you visited immediately before navigating to our site. In the event of any technical issues with our site we may also need to collect server logs, which can tell us dates and times of access, details of crashes and other system activity, and the content or pages viewed.

Our site also uses cookies – small text files that are placed on your device to help websites provide a better experience. You can find more details about how we use cookies in our Cookie policy.

As well as keeping our site working, making sure it displays correctly on your device and enabling us to investigate and fix technical issues, we may also analyse the data we have collected to help us understand and improve the effectiveness of the site and its content. For example, we may look at which pages or features are most popular or how visitors tend to navigate to our site. Where we do this, we normally use the information in aggregated format, so it is not linked to any individual.

### Other Circumstances in which We may Use Your Personal Data

Other than as set out above in this policy, we do not use your personal information for other purposes except in the following, unlikely, circumstances where the law permits or compels us to do so:

- Where we have a concrete suspicion that our website is being abused, used for illegal purposes or used in a way that may be detrimental to our interests or those of our employees, suppliers, customers, or other Sumitomo Electric Group entities. In such cases we may use your personal data in our investigations and, if necessary and proportionate, share it with the police or other law enforcement bodies.
- Where necessary to enforce our Terms of Use and legal notices.
- Where necessary to establish, pursue or defend legal claims in respect of SEWS-E or a Sumitomo Electric Group entity.
- Where necessary to meet our legal obligations or those of a Sumitomo Electric Group entity.
- To comply with a court order or binding decision.

## Sharing Your Information

### External Third Parties

Like most organisations we use external companies to provide services and perform some business support functions for us. Where this means an external third party needs to use or access your personal information we take steps to ensure they give it the same level of care and protection as we do and that they use it only to provide the service for which we have engaged them in line with this policy. Both we and they are bound by the requirements of data protection law, and we are required to put in place contractual measures that reinforce those obligations. Examples of functions for which we may use the services of third parties are:

- Web hosting and support services
- Data storage
- Mailing and communication
- Recruitment
- Analysis, research and web optimisation services

## Other Companies in Our Group

As part of the Sumitomo Electric Group, we may from time to time need to transfer personal data to our parent company or another Sumitomo Electric Group entity or affiliate to fulfil any of the purposes or activities set out in this policy, to comply with a legal obligation, or to exercise or protect a legitimate business interest. Where we do this, we take steps to ensure that your personal data is used only as set out in this policy.

## Transferring Personal Data Outside Europe

Some of the third parties that provide business support functions for us may be located, or carry out some activities, in countries outside the EEA and as a global organisation, the Sumitomo Electric Group operates in multiple countries around the world (including China, South Korea, India, Malaysia, Egypt, Morocco, South Africa, Tunisia, United Arab Emirates, Cambodia, Indonesia, Philippines, Thailand, Myanmar, Vietnam, Singapore, Hong Kong, Taiwan, Australia, Russia, USA, Brazil, Canada, Mexico as well as within Europe). This means that from time to time we may need to transfer personal data to countries outside the EEA which do not have the same standard of data protection as those within Europe. Where we do this, we put in place legal measures to ensure your personal data receives the same level of protection as it would within Europe. We do this by using standardised contractual clauses (sometimes called 'the EU Model Clauses') approved by the European Commission and European privacy regulators, although there are alternative approved legal mechanisms which we can use if we feel they are more appropriate. Where necessary, we will also put in place any additional contractual measures required by local law or regulation except (within the EU) where they conflict with the General European Data Protection Regulation (GDPR). If you would like to know more about the EU 'Model Clauses' or the requirements companies have to fulfil when transferring personal data overseas, you can find information [here](#).

## Other Circumstances in which We may Share Your Information

Other than as set out in this policy, we do not share your personal data with third parties unless:

- we are compelled by law and have received a warrant, court order or other legally valid proof of authority.
- Our business undergoes a merger, reorganisation, restructure or other corporate transaction and we need to transfer your personal data in order to continue to fulfil the activities and purposes set out in this policy.

Whenever we share personal data and whatever the circumstances, we will always have due regard to your privacy and the security of your data.

## How Long do We Keep Your Personal Data?

We keep your personal data only as long as necessary to fulfil the purpose for which we collected it as set out in this policy, unless we are required by law or court order to keep it for longer. Once it is no longer required, your personal information is securely deleted.

## Your Data Protection Rights

Data protection law gives you a number of rights over your personal data:

- The right to have errors and inaccuracies corrected. If you believe we are holding personal information that is incorrect in relation to your CV, please contact us at [gdpr.enquiries@sews-e.com](mailto:gdpr.enquiries@sews-e.com).
- The right to have personal data deleted where we have no valid legal basis for holding it.
- The right to know what personal data we are holding about you and to access a copy.
- The right to withdraw consent, where applicable. We explain how to do this in relation to your CV [here](#).
- The right to 'data portability' (which enables consumers to reuse certain types of online personal data by making it available in a commonly-used, machine readable format).
- The right to object to processing that is being carried on the basis that it is in our legitimate business interest, where that interest is outweighed by your rights and freedoms.
- The right to restrict or prevent processing of your personal data in certain circumstances.
- The right not to be subjected to wholly-automated decision making.

As the personal data we collect via our website is limited, most of these rights are unlikely to be relevant, but to the extent that they do apply, we will action any request within one month and if we are not able to comply with your request, we will tell you why.

You can find out more about your data protection rights, what they mean in practice and the restrictions the law places on them on the [European Commission Website](#), the [UK ICO website](#) or, if you are located in Europe, on the website of the data protection regulator in your own country.

### **Queries and Complaints**

If you have any questions or concerns about how SEWS-E uses your personal data, or about how the above data protection rights apply under this policy, please contact us at [gdpr.enquiries@sews-e.com](mailto:gdpr.enquiries@sews-e.com).

Data Protection law also gives you the right to lodge a complaint with the data protection regulator in your country. As our headquarters are in the UK, our principal regulator for data protection matters is the UK's ICO, which may be contacted via its website at <https://ico.org.uk>. If you are located in another EU country, you may prefer to contact your own data protection regulator in the first instance. Details of all EU data protection regulators may be found on the [European Commission Website](#).