

PRIVACY POLICY

Please read these terms carefully before using this website



This Privacy Notice (Notice) gives you further information about the way we collect and use personal information about you (which is known as “personal data” under data protection legislation).

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

You have the right to object to us processing your personal data for direct marketing (which we do only with your consent) and also to processing which is carried out for the purposes of our legitimate interests. For more information, see the section “Your Rights” below.

1. WHO WE ARE

Please see page 9 of this policy to see who we are. The entities listed are the companies (TR Group Companies) within the Trifast plc group of companies. References in this Notice to “we” or “us” are to the entities listed. This information may be updated from time to time. Each of the listed entities are committed to protecting your privacy and are joint data controllers within the meaning of data protection laws applicable in the European Union (EU) and European Economic Area (EEA).

As joint data controllers, we have arrangements between us to ensure that we handle your personal data correctly and in accordance with data protection law. These arrangements reflect our respective roles and responsibilities in relation to you, and considers which entity is in the best position to fulfil each obligation to you. This arrangement between us does not affect your rights under data protection law. For more information on these arrangements, feel free to contact us as set out under “Contacting Us” below.

2. YOUR INFORMATION

We are committed to protecting your personal data and right to privacy. We will always keep your personal data safe and comply with applicable data protection legislation from time to time in place.

As a customer or a visitor to our website we, and the companies that work on our behalf, collect information on you. This includes your personal information and any information we may buy.

We also collect information on your use of our website, including any forums you visit and how you arrived at our website in the first place by using cookies or other tracking technologies.

Some other companies also collect certain information on you when you use our website, such as social networking sites or web analytic companies.

We will only keep information about you for as long as we need to, and we make sure that any companies that process your information on our behalf do the same.

By using our website or submitting information to us through or in connection with our website, you signify your consent to our collection, use and disclosure of your personal information in accordance with this privacy policy. If you do not agree with this privacy policy, you must not use our website or submit information to us through or in connection with our website.

When you use our website and services, we request personal information about you such as your name, postal address, email address, company name and telephone number. We may also ask for demographic information to enable us to

PRIVACY POLICY

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provide a personalised service to you.

The information you provide is either manually or electronically stored. We sometimes supplement that information with information that is received from third parties. For instance, if inaccurate postal codes are received, we may use third party software to fix them.

3. USE OF PERSONAL DATA

When we collect or ask you for personal data it may be for any of the following purposes:

- to provide any services and other information which you may request or which we may offer;
- to contact you to inform you of our services or events;
- to send you newsletters we think will be of interest to you;
- to use your personal data for marketing purposes and market research;
- to handle any enquiries you may have;
- to administer this website and help us improve our services;
- to analyse the effectiveness of our marketing and to help us provide more relevant offers, advice and information to you and our other guests
- to better understand your requirements in order to develop and improve our products and services so as to provide you with an enhanced experience;
- to build up a clearer picture of our customers and site visitors both as a group and as individuals and thereby provide you with a seamless, relevant and consistent service;
- to provide you with information about events, special offers, promotions, competitions and other relevant matters concerning the TR Group Companies, and the goods which they sell and services they provide (if you have given your consent for us to do so);
- to advertise our TR Group Companies and services on social media to other people who may also be interested in what we have to offer (if you have given your consent for us to do so);
- to ensure that the information we hold is kept accurate and up to date;
- (if we have your consent, where this is required by law) for research and analysis and in order that we may contact you, from time to time, for such a purpose or for the purpose of conducting surveys or focus groups; and
- to notify you about changes to our services.

INFORMATION THAT WE MAY BUY

If we purchase information on you from another company, such as marketing lists, we promise to take all the necessary checks to make sure your information was collected legally.

We may also purchase profile information from other companies to better understand our customers and our market. This helps us to provide you with better suited products and services.

INFORMATION ON YOUR USE OF OUR WEBSITE

We collect information about your use of our website. This includes the pages of our website that have been viewed by you and for how long, and your website journey. This is done by cookies or other tracking technologies (please see further information and cookies policy below) and will include your IP address, and if you have logged in, your log-in details too.

PRIVACY POLICY

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FORUMS

If you choose to post messages in any forum or other message areas on our website, we will collect that information you provide to us. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

HOW YOU ARRIVED AT OUR WEBSITE

We collect information about how you arrived at our website in the first place. This can include what links or adverts of ours you've viewed or clicked on to reach us, or any search terms you've used. If we understand how you look for us, we hope to make it easier to be found.

If you see an advert of ours elsewhere, we or our ad agencies that work on our behalf, place a cookie on your browser. This is so that when you arrive at our website we can recognise that you've seen an advert of ours elsewhere.

OTHER COMPANIES

Some other companies also collect certain information from our website. This includes Social networking applications. We have social networking widget on a number of our pages. The widget gives you the tools to bookmark our websites, blog, share, tweet and email our content to a friend. Your interaction with those options will result in further cookies, from the providers you use, being placed on your system. To opt-out of the data collection and aggregation created from your interactions, please contact us as set out under "Contacting Us" below.

KEEPING INFORMATION ONLY AS LONG AS WE NEED TO

We will only keep information about you for as long as we need to. We make sure that any companies that process your data on our behalf do the same.

4. MARKETING & COMMERCIAL USE

When you gave us your information, you will have been offered the opportunity to sign up to our marketing communications.

You can subscribe to or unsubscribe from our marketing communications at any time by following the instructions in our marketing emails or by contacting us on the details below.

5. SHARING

We do not share, sell, distribute or transfer your personal data with or to third parties, except as otherwise provided for in this privacy policy.

- with our company group;

We share your personal data between ourselves (see Who We Are above) by having joint access to a central database shared by all TR Group Companies. Each location shares the personal data of its own Customers or visitors with other TR Group Companies, by including it as part of our central database. This allows you, as a Customer or visitor, to benefit from offerings from all TR Group Companies.

For the purposes set out above, we may also provide your personal data to our suppliers and processors who perform certain business services for us. We share your personal data with third parties who:

PRIVACY POLICY

Please read these terms carefully before using this website



- if you have given your consent for us to do so communicate with you on our behalf via email;
- use your location to deliver specific electronic messaging to you (based on your location when you open an email or electronic message from us); and
- use your location to show you targeted website content.

In some cases the personal data we collect from you may also be processed outside the UK and the European Economic Area (EEA) and such destinations may not have laws which protect your personal data to the same extent as in the UK and the EEA. As we are based in the UK we will also transfer your personal data from the EEA to the UK. We have obligations to ensure that your personal data processed by us or by our suppliers and partners operating outside the UK and the EEA is treated securely and is protected against unauthorised access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this Notice. Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- there is an Article 45 of the UK/EU GDPR decision
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law

Please see page 10 of this policy for a list of the suppliers and processors we currently use, and other parties to whom we disclose your personal data. The link also has information about how these parties use your personal data, any processing they perform outside the EEA, and the safeguards that are used to protect your personal data if this happens. This information may be updated from time to time. Please ask us if you would like more information about the safeguards that are used to protect your personal data when it is processed outside the EEA (see Contacting Us below).

In addition, we may disclose your personal data:

- only if necessary, with third party approved distributors, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us;
- with credit reference agencies when we need to and third party companies conducting marketing activities on our behalf.
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to protect the rights, property or safety of our business, our customers or others. This includes, in specific cases, exchanging information with other companies and organisations for the purposes of fraud protection; and
- to successors in title or replacement operators of all or part of our respective businesses.

6. THE LEGAL BASIS FOR US USING YOUR PERSONAL DATA

1. It is necessary for us to process your email address for performance of the contract between us in relation to any sale of goods.
2. In certain circumstances, we process your personal data after obtaining your consent to do so for the purposes of:
 - sending you marketing communications;
 - using your location to deliver specific messaging and content to you; and
 - using your location to monitor the effectiveness of our messaging.
3. In most cases, it is in our legitimate interests to collect and use the personal data referred to above (see what personal data do we collect about you above) so that we can:

PRIVACY POLICY

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part of the Trifast plc Group

- to follow up on any enquiries raised by you;
- provide you with a service that is as useful and beneficial to you as possible, including by personalising our contact with you, making sure we tell you about all the offers that relate specifically to your preferred location, and contacting you using your preferred method of communication; and
- better understand our customer base so that we can improve our services and marketing activities (which could also benefit you).

When we rely on our legitimate interests in order to collect and use your personal data (including for the purposes of automated decision making and profiling as set out in Automated decision making below), we must consider whether those legitimate interests are overridden by your interests or your fundamental rights and freedoms. We may continue only if we decide that your interests, rights and freedoms do not override our legitimate interests.

We have considered these matters, and where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected we will not use your personal data unless there is another legal basis for us to do so (either that it is necessary for us to perform our contract with you, or on the basis of your consent). For example, we believe that collecting your location data may be intrusive, and so we will only do so with your consent.

7. AUTOMATED DECISION MAKING

We may use technology which tracks your purchasing behaviour in TR Group Companies, which helps us to build a profile of your preferred products and services. What this means for you is that you might be more likely to receive marketing and site content that are tailored to your specific preferences, based on your previous activity. It also means that we don't send the same marketing to all our customers and visitors, so you may not be made the same offers as another customers or visitors. If you don't agree with an automated decision that our technology has made in relation to you, you can let us know (see Contacting Us below). You may still have the right to object to us processing your personal data for the purpose of automated decision making or to restrict us from doing so (see Your Rights above).

Please note that the legal basis for us carrying out this automated decision making "or "profiling") activity is that it is in our legitimate interests to do so, having taken into account whether your interests and fundamental rights and freedoms are overridden by this type of processing. See The legal basis for us using your personal data (above) for more information.

8. SECURITY

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 data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

9. CHANGES TO THIS PRIVACY POLICY

We keep our privacy policy under regular review and we log any updates.

We reserve the right to amend this privacy policy and if we do so we will post the changes on this page. It is your responsibility to review the privacy policy every time you submit information to us or place an order.

10. YOUR RIGHTS

By law, you have a number of rights when it comes to your personal data. Further information and advice about your

PRIVACY POLICY

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rights can be obtained from the data protection regulator in your country.

RIGHTS	WHAT DOES THIS MEAN?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we're providing you with the information in this Notice.
2. The right of access	You have the right to obtain access to your personal data (if we're processing it), and certain other information (similar to that provided in this Privacy Notice). This is so you're aware and can check that we're using your personal data in accordance with data protection law.
3. The right to rectification	You are entitled to have your personal data corrected if it's inaccurate or incomplete.
4. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing	You have rights to 'block' or suppress further use of your personal data. When processing is restricted, we can still store your personal data, but may not use it further. We keep lists of people who have asked for further use of their personal data to be 'blocked' to make sure the restriction is respected in future.
6. The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
7. The right to object processing	You have the right to object to processing for direct marketing (which we do only with your consent) and also to processing which is carried out for the purposes of our legitimate interests.
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
9. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

Please see the section titled Requests to us below, for more information on how we will handle your requests. If you would like a copy of some or all of the personal information of yours we hold, please contact us on the details below. We will not charge you for this information and we will try to respond to you as quickly as possible and in any event, within 40 days of receipt of your request. You may also find it helpful to refer to the [guidance from the UK's Information Commissioner](#) on your rights under the UK GDPR.

We want to make sure that your personal information is accurate and up to date. Please always let us know if you think it is not.

11. INFORMATION ABOUT OUR USE OF COOKIES & OTHER TRACKING TECHNOLOGIES

Cookies or other tracking technologies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

PRIVACY POLICY

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A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We may use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them below:

STRICTLY NECESSARY

COOKIE KEY	DOMAIN	DESCRIPTION
trreq	trdemosite.azurewebsites.net	This cookie is used to manage the enquiry basket.
ASP.NET_SessionId	trdemosite.azurewebsites.net	General purpose platform session cookie, used by sites written with Microsoft .NET based technologies. Usually used to maintain an anonymised user session by the server.
ARRAffinitySameSite	trfastenings.com	Enables load balancing, this cookie ensures that requests from one visitor browsing session are always handled by the same server in the cluster.
__RequestVerification-Token	trdemosite.azurewebsites.net	This is an anti-forgery cookie set by web applications. It is designed to stop unauthorised posting of content to a website, known as Cross-Site Request Forgery. It holds no information about the user and is destroyed on closing the browser.
ARRAffinity	trfastenings.com	It is used for load balancing to make sure the visitor page requests are routed to the same server in any browsing session.
CookieScriptConsent	trdemosite.azurewebsites.net	This cookie is used by Cookie-Script.com service to remember visitor cookie consent preferences. It is necessary for Cookie-Script.com cookie banner to work properly.

PERFORMANCE

COOKIE KEY	DOMAIN	DESCRIPTION
ai_session	trfastenings.com	This cookie name is associated with the Microsoft Application Insights software, which collects statistical usage and telemetry information for apps built on the Azure cloud platform. This is a unique anonymous session identifier cookie.

PRIVACY POLICY

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ai_user	trfastenings.com	This cookie name is associated with the Microsoft Application Insights software, which collects statistical usage and telemetry information for apps built on the Azure cloud platform. This is a unique user identifier cookie enabling counting of the number of users accessing the application over time.
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TARGETING

COOKIE KEY	DOMAIN	DESCRIPTION
_gat	trfastenings.com	This cookie name is associated with Google Universal Analytics, according to documentation it is used to throttle the request rate - limiting the collection of data on high traffic sites.
_ga	trfastenings.com	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.
_gid	trfastenings.com	This cookie is set by Google Analytics. It stores and update a unique value for each page visited and is used to count and track pageviews.
VISITOR_INFO1_LIVE	.youtube.com	This cookie is set by Youtube to keep track of user preferences for Youtube videos embedded in sites; it can also determine whether the website visitor is using the new or old version of the Youtube interface.
YSC	.youtube.com	This cookie is set by YouTube to track views of embedded videos

WEBSITE ANALYTICS

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google").

Google Analytics uses cookies, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

No personal data is obtained, stored or shared by this site or by Google. Their privacy policy can be found here <http://www.google.co.uk/policies/privacy>.

PRIVACY POLICY

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If you would like to Opt-out of this, Google has provided a browser tool that enables this. Click <https://tools.google.com/dlpage/gaoptout> for more details.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Please contact us on the details below if you require information about disabling any cookies on our website.

You can find more information about cookies at: www.allaboutcookies.org and <http://www.youronlinechoices.com/uk/>

12. LINKS TO OTHER WEBSITES

We are not responsible for the privacy policies and practices of other websites even if you accessed the third party website using links from our website. We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have any concerns or questions.

13. GOVERNING LAW

This Privacy Policy forms part of our [Website Terms of Use](#)

14. REQUEST TO US

We are required by law to act on requests and provide information free of charge, except where your requests are manifestly unfounded or excessive (in particular because of their repetitive nature) in which case we may charge a reasonable fee (taking into account the administrative costs of providing the information or communication, or taking the action requested), or refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

15. CONTACTING US

If you have a question, complaint or query around how we use your information, please contact marketing@trfastenings.com, call us on +44 (0)1825 747200 or write to us at: TR Fastenings Limited, Bellbrook Park, Uckfield, East Sussex, TN22 1QW.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK; and
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA

The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

For a list of EEA data protection supervisory authorities and their contact details see [here](#).

For further information please contact us: marketing@trfastenings.com

PRIVACY POLICY

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Trifast plc group of companies

Trifast plc

TR Fastenings Limited
Lancaster Fastener Company Limited
Precision Technology Supplies Ltd

TR Miller Holding B.V.
TR Hungary Kft
TR Southern Fasteners Ltd
TR Fastenings Norge AS
TR Fastenings AB
TR V.I.C Viterie Italia Centrale, S.p.A
TR Kuhlmann GmbH
TR Fastenings España
TR Fastenings Poland Sp. Z O.O

TR Fastenings Inc.
Falcon Fastening Solutions, Inc.

TR Asia Investment Holdings Pte Ltd
TR Formac Pte Ltd
Special Fasteners Engineering Co. Ltd
Power Steel and Electro-Plating Works Sdn. Bhd. ("PSEP")
TR FORMAC Fastenings Pvt Ltd
TR Formac Co Ltd

PRIVACY POLICY

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Trifast plc group of companies - third party suppliers

THIRD PARTY	WHY DO WE SHARE YOUR PERSONAL DATA WITH THEM?	HOW IS YOUR PERSONAL DATA USED AND WHY?
Constant Contact	Constant Contact provides a contact management service to enable us to keep up to date and accurate contact records.	Storage of contact records and use of your personal data to send you marketing communications including details of products or services you may be interested in.
Jotform	Jotform provide a form building service to enable us to conduct surveys and manage online forms.	Your details are held on Jotform to enable us to collate the information.
Google Analytics	Google Analytics is a web analytics service offered by Google that tracks and reports on our website traffic.	Google Analytics is used to track website activity such as session duration, pages per session and the bounce rate of individuals using the site, along with the information on the source of the traffic.
Lead Forensics	Lead Forensics is an IP tracking solution, with the world's largest B2B IP address database. Lead Forensics reveals the identity of our anonymous website traffic.	Lead Forensics uses a small piece of code, much like Google Analytics, which tracks IP addresses visiting a website. Those IP addresses are then matched to data held by Lead Forensics, providing accurate information about unknown website visitors.