

MTEC WEBSITE PRIVACY AND COOKIE NOTICE

Policy Area	HR
Standard:	Mtec Website Privacy and Cookie Notice
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Contents

About this policy	3
2. Information we collect about you	4
3. How we use your information.....	4
4. When we send you marketing messages.....	6
5. Who we share your information with.....	6
6. Where your information is stored or transferred to	7
7. How we keep your information safe	7
8. How long we keep your information.....	7
9. Your legal rights.....	8
10. Cookie Policy	9
Document Control.....	11

About this policy



Who should read this policy: Everyone who accesses information about our services through our website at: <https://mtecfineart.com/> (Website) including customers of our business, prospective customers, or if you are an alternative business contact, such as a supplier or service provider to our business.



What is covered: This policy sets out what information we collect about you, what we use it for and who we share it with. It also explains your rights and what to do if you have any concerns about your personal data.



Who to contact about this notice: If you have any questions about this privacy policy, how we handle your personal data or you are looking to exercise one of your rights, please contact: privacy@mtecfineart.com.



Latest updates: This policy was last updated 13th July 2023. We may sometimes need to update this policy to reflect changes to the way we provide our services or to comply with updates to data protection law. Where possible, we will notify you of any substantive changes but please check back regularly to see whether any changes have occurred.



Who checks this policy is enforced: The Information Commissioner's Office (ICO) is the UK regulator and is responsible for checking that businesses comply with UK data protection law.

1. About us








We are Mtec Warehousing Limited, registered in England and Wales with company number 3986255 whose registered address is Manufactory House, Bell Lane, Hertford, Hertfordshire, SG14 1BP (Mtec / we / us /our). We provide services in art transport, shipping, installation, fabrication and storage, as well as gallery and project management services.

If you visit and browse our Website, and/or purchase our services and we enter into a contract with you, we are the controller of your information (which means we decide what information we collect and how it is used). We are registered with the ICO, the UK regulator for data protection matters, under number Z930099X.

Please contact us at privacy@mtecfineart.com if you have any questions about this privacy notice or the way that we use information. You can also contact us through our postal address: Unit 10, Gentlemens Field, Westmill Road, Ware, Hertfordshire, SG12 0EF, United Kingdom.

2. Information we collect about you

Personal data means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we collect and where we receive it from below:

Types of Personal Data		Received from
	Identity Data – your first and last name or title	• You, when you visit our Website, contact us (including through our Contact Us page), and/or when you contract with us when purchasing our services
	Contact Data – your email address (and any other personal data you provide, including e.g. telephone numbers, home address).	• You, when you contact us via our Contact Us web-page, and/or when you contract with us when purchasing our services
	Financial Data – for example, bank account details, credit or debit card details.	• You, where you provide this to us when purchasing our services
	Location Data – your device location if you log into our systems remotely.	• You (including via cookies) when you visit our Website
	Marketing and Communication Data – includes your preferences in receiving marketing from us and our third parties and your communication preferences.	• You, following contact with us via telephone and/or email and/or when you submit your information via our Contact Us page
	Technical Data – internet protocol (IP) address, browser type and version, time zone setting and generic location, browser plug-in types and versions, operating system and platform on the devices you use to access our systems.	• You (via cookies and other similar technologies) when you use our Website
	Usage Data – information about how you use our systems	You (via cookies and other similar technologies) when you use our Website.

3. How we use your information

Under UK data protection law, we need a legal reason (known as a **lawful basis**) for holding, collecting and using your personal data. There are six main legal reasons which organisations can rely on.

The most relevant are:

- to enter into and perform our **contract** with you;
- pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy);
- to comply with a **legal obligation** that we have;
- where you have **consented** to us using your personal data a certain way.

The following table sets out when we rely on each lawful basis.

Lawful Basis	Purpose for using your personal data
Contract	<ul style="list-style-type: none"> • To administrate or perform our contract with you. • To process your payment information in connection with any contract we have with you. • To send you updates about the services you have bought (e.g. confirmation of order, delivery time).
Legal Obligation	<ul style="list-style-type: none"> • Recording your preferences (e.g. marketing) to ensure that we comply with data protection laws. • Where we send you information to comply with a legal obligations (e.g. where we send you information about your legal rights).
Legitimate Interests	<p>Where using your information is necessary to pursue our legitimate business interests to:</p> <ul style="list-style-type: none"> • improve and optimise our Website; • monitor and make improvements to our Website to enhance security and prevent fraud; • to provide our services to you and ensure the proper functioning of our Website; and • to protect our business and defend ourselves against legal claims. • Where we use your information for our legitimate interests, we have assessed whether such use is necessary and that such use will not infringe on your other rights and freedoms.
Consent	<ul style="list-style-type: none"> • Where you have provided your consent to providing us with information or allowing us to use or share your information. • Where you have consented to receive marketing material from us.

Where we need to collect your personal data (for example, in order to fulfil a contract we have with you), failure to provide us with your personal data may mean that we are not able to provide you with the services. Where we do not have the information required about you to fulfil an order, we may have to cancel the service ordered.

4. When we send you marketing messages

If you have consented to receiving marketing messages from us, you can opt out of these at any time by clicking the “Unsubscribe” link in the footer of any email we send you. You can alternatively let us know at privacy@mtecfineart.com.

Opting out of marketing will not affect our processing of your personal data in relation to any order you have with us and where we are required to use your personal data to fulfil that order or provide you with certain information.

Where you have bought services from us before, we may use your information to send you marketing messages about a similar service that we think (based on the information you have provided us) would be of interest to you. If you no longer wish to receive these messages, you can opt out at any time by the same methods as above.

5. Who we share your information with

We share your personal data with:

- **Our personnel:** our employees (or other types of workers) who have contracts containing confidentiality and data protection obligations in order to process your order.
- **Our supply chain:** other organisations that help us provide our services. We ensure these organisations only have access to the information required to provide the support we use them for and have a contract with them that contains confidentiality and data protection obligations.
- **Our Website hosting provider:** the company who provides website hosting services to us may have access to some information (e.g. information from cookies and tracking technologies) to ensure that the Website is working correctly.
- **Credit agencies:** We may refer our clients to credit agencies, but we will discuss this with you and obtain your consent before sharing your personal data with such third parties.
- **Regulatory authorities:** such as HM Revenue & Customs.
- **Our professional advisers:** such as our accountants or legal advisors where we require specialist advice to help us conduct our business.
- **Third party marketing providers:** when you sign up to receive marketing messages or newsletters from us.
- Any **actual** or **potential buyer** of our business.

If we were asked to provide personal data in response to a court order or legal request (e.g. from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response.

6. Where your information is stored or transferred to

We store company information (including your personal data) in servers located in the UK. We will only transfer information outside of the UK or the EU where we have a valid legal mechanism in place (e.g. by using contracts approved by the European Commission or UK Secretary of State).

7. How we keep your information safe

Mtec employs high standards of security in order to protect the personal data under its care. We have put in place appropriate security and safety measures to prevent your personal data from being lost or illegally accessed by those who do not have permission. These measures include:

- access controls and user authentication;
- internal IT and network security;
- regular testing and review of our security measures;
- staff policies;
- incident and breach reporting processes; and
- business continuity and disaster recovery processes.

If there is an event or incident affecting your personal data, we will keep you informed. We may also need to notify the regulator (where required under data protection law) and if we make decisions about personal data jointly with another party (for example, a third-party marketing provider), we may need to notify them.

8. How long we keep your information

Where we are responsible for making decisions about how to collect and use your personal data, we will only keep your personal data for as long as necessary to fulfil the purposes we collected it for or as long as required to fulfil our legal obligations.

When we consider how long to keep your personal data, we will consider whether it is still necessary to keep it for the purpose we collected it, or whether the same purpose could be achieved by holding less personal data. We will also consider the volume, nature, and sensitivity of the personal data and the potential harm to you if there was an incident affecting your personal data.

We may keep Identity Data, Contact Data and certain other data (specifically, any exchanges between us by email or any other means) for up to seven years after the end of our contractual relationship with you. Any personal data collected from customer enquiries or leads that we receive which do not qualify into signed contracts will be deleted within one year of collection, (unless your organisation subsequently becomes our customer, in which case we keep it for a minimum of seven years).

If you browse our Website, we keep personal data collected through our analytics tools for only as long as necessary to fulfil the purposes we collected it for (see our Cookie Policy at section 10 below for further information).

If you have asked for information from us or you have subscribed to our mailing list, we keep your details for a reasonable time or until you ask us to stop contacting you.

Where we have converted personal data into **anonymous data** (which means it is no longer possible to identify a person from the information) we keep that information indefinitely.

9. Your legal rights

You have specific legal rights in relation to your personal data.

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. We may charge a fee where we decide to proceed with a request that we believe is unfounded or excessive. If this happens we will always inform you in writing.

These are as follows:



Access: You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law.



Correction: You can ask us to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.



Deletion: You can ask us to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.



Restriction: You can ask us to restrict how we use your personal data and temporarily limit the way we use it (e.g. whilst we check that the personal data we hold for you is correct).



Objection: You can object to us using your personal data if you want us to stop using it. We will always comply with your request if you ask us to stop sending you marketing communications. In other cases, if we think there is a good reason for us to keep using the information, we will let you know and explain our decision.



Portability: You can ask us to send you or another organisation an electronic copy of your personal data.



Complaints: If you are unhappy with the way we collect and use your personal data, you can complain to the Information Commissioner or another relevant supervisory body, but we hope that we can respond to your concerns before it reaches that stage. Please contact us at privacy@mtecfineart.com.

If you would like to exercise any of your legal rights, please contact: privacy@mtecfineart.com.

10. Cookie Policy

Our Website uses cookies and similar technologies.

Cookies are small text files that are downloaded to your device. Cookies contain uniquely generated references which are used to distinguish you from other users. They allow information gathered on one webpage to be stored until it is needed for use on another, allowing our Website to provide you with a personalised experience (like remembering your “favourites”) and provide us with statistics about how you interact with our Website.

Cookies are not harmful to your devices (like a virus or malicious code) but some individuals prefer not to share their information (for example, to avoid targeted advertising).

Different types of cookies

Session vs. persistent cookies: cookies have a limited lifespan. Cookies which only last a short time or end when you close your browser are called **session cookies**. Cookies which remain on your device for longer are called **persistent cookies** (these are the type of cookies allow websites to remember your details when you log back onto them).

First party vs third party cookies: cookies placed on your device by the website owner are called **first party cookies**. When the website owner uses other businesses’ technology to help them manage and monitor their website, the cookies added by the other business are called **third party cookies**.

Categories of cookies: cookies can be grouped by what they help the website or website owner do (the **Purpose**).

- **Necessary cookies** are cookies which help a website to run properly (when they are strictly necessary cookies it means their only function is to help the website work).
- **Performance cookies** help a website owner understand and analyse how website visitors use their website.
- **Analytical cookies** are used to understand how visitors interact with a website. These cookies help provide information on metrics the number of visitors, bounce rate, etc.
- **Marketing cookies** tailor online adverts to reflect the content you have previously browse and help inform companies about your interests so they can show you relevant adverts.

What do we use cookies for?

We use cookies to:

- track how visitors use our Website
- record whether you have seen specific messages we display on our Website
- keep you signed into our Website
- capture and analyse information such as number of views and shares where we post content and links to content

The cookies we use are:

Cookie	Purpose	What it does	How long it lasts
cookieyes-consent	Necessary	CookieYes sets this cookie to remember users' consent preferences so that their preferences are respected on subsequent visits to our Website. It does not collect or store any personal information about the site visitors.	2 years

We can only use cookies with your permission. When you first visit our Website, you will be prompted by a message, also known as a cookie banner, where you can choose to accept or decline our cookies, and customise your cookie settings and preferences.

You can choose to decline cookies, but if you turn off necessary cookies, some pages and functions on our Website may not work properly. You can also manage cookies through your browser settings or device settings (your user manual should contain additional information).

You can also delete cookies directly with the relevant third parties (for example, you can disable Google Analytics on their website).

Document Control

Revision	Changes made	Who	Date
0.1	Document creation	Stephenson Law	June 2023
0.2	Review and update	Lia Nelissen	July 2023
0.3	Review by	Lia Nelissen	August 2023
0.4	Update by	Lia Nelissen	October 2023
0.5	Approved by	Kelly Shaw	November 2023