

**POSEIDON PLASTICS**

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## Privacy Policy

Poseidon Plastics, a private limited company incorporated in England and Wales (company number 11736799) whose registered office is at North Lab Annexe 1, Technical Development Area, the Wilton Centre, Redcar, UK TS10 4RF (**“Poseidon”**, **“we,”** **“us,”** and **“our”**) is the owner and operator of the Website (the **“Website”**).

The term **“you”** or **“your”** refers to the user or viewer of our Website.

This privacy policy (the **“Privacy Policy”**) will inform you as to how we look after your personal data (**“Personal Data”**) when you visit our website and any related or linked documents (the **“Website”**).

Personal Data is any data or information from which an individual can be identified. It does not include data where the individual’s identity has been removed (anonymous data).

This Website is not directed at children under 16, and we do not knowingly collect, use or disclose Personal Data from anyone under the age of 16. If we become aware that we have unknowingly collected Personal Data from a child under the age of 16, we will make reasonable efforts to delete such data from our records. Please read our Privacy Policy carefully before using, or submitting information to, this Website. This Privacy Policy supplements any other privacy notice or fair processing notice we may provide to you and is not intended to override them.

From time to time, we may modify this Privacy Policy. Please revisit this page of the Website periodically to make sure that you have read the most recent version. Where we make substantive changes to this Privacy Policy and how we process your Personal Data, we will notify you of those changes.

If you have any questions or concerns regarding this cookie policy, please contact us by email at: [info@poseidonplastics.com](mailto:info@poseidonplastics.com) or by post to: North Lab Annexe 1, Technical Development Area, the Wilton Centre, Redcar, UK TS10 4RF

### **Purpose of this Privacy Policy**

This Privacy Policy aims to give you information on how Poseidon collects and processes your Personal Data through your use of this Website, including any data you may provide through this Website when you. It is also intended to inform you about the choices you have regarding our use of, and your ability to correct, that Personal Data.

### **Information we may collect about you**

We may collect, use, store and transfer different kinds of Personal Data about you, which may include:

- Your name, title, date of birth and gender (**“Identity Data”**).
- Your address, email address and telephone number i.e. personal information which you knowingly give us through the email alert subscription (**“Contact Data”**).
- Your bank account (**“Financial Data”**).
- Details about any investments you have made in us (**“Investment Data”**).



- Your IP address, login data, browser type and version, and operating system and platform (“**Technical Data**”).
- Information about how you use our Website (“**Profile/Usage Data**”).
- Details of your marketing communication preferences from us and our third parties.

We may also collect, use and share aggregated data (“Aggregated Data”) such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not legally considered to be Personal Data as such data does not directly or indirectly reveal your identity. For example, we may use this data to determine how our users engage with our Website or access specific features.

We do not collect any special categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data, and criminal convictions or offences).

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed of any changes to your Personal Data during your relationship with us.

### **If you fail to provide us Personal Data**

Where we need to collect Personal Data by law or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform such contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may cancel a product or service you have with us and notify you of such cancellation.

### **How your Personal Data is collected**

We use different methods to collect data from you and about you including through:

**Direct Interactions.** You may give us your Identity Data, Contact Data and Financial Data by completing forms on our Website, or by corresponding with us by email, phone or post. This includes Personal Data you provide when you:

- interact with our Website;
- correspond with us;
- request marketing communications; and
- engage with us on social media.

**Automated technologies.** As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies – a small piece of information sent from our Website and stored in the web browser of your computer and/or device – and other similar technologies. Each time you load our Website, the browser sends the cookie back to the server to notify our Website of your previous activity. You may refuse the use of cookies by selecting the appropriate settings in your browser. However, if you do this you may lose some useful functionality and some parts of our Website may not function properly.



**Third Parties.** We may receive Personal Data about you from various third parties and public sources as set out below:

- Analytics providers who provide us with Aggregated Data, Technical Data and Usage Data.
- Service providers who may provide us with Identity Data, Contact Data and Payment Data.

### **How do we use your Personal Data and the lawful basis for our use?**

We will only use your Personal Data when we have a lawful basis for doing so. Our processing of your Personal Data is necessary for the purposes explained below:

- **Performance of a contract.** We may process your Personal Data to perform a contract you have entered into with us.
- **Necessary for our legitimate interests.** We may process your Personal Data for ongoing business purposes, for example to: (i) understand our customers; (ii) to evaluate, develop and improve our products and Website; (iii) to respond appropriately to queries received about our business and products; (iv) to prevent fraud; (v) to protect our business interests; and (vi) to ensure complaints are investigated.
- **Compliance with a legal obligation.** We may process your Personal Data to comply with various legal obligations including ensuring that you do not receive marketing communications from us in circumstances where you have advised us that you do not wish to receive those communications.

If you would like further information about the specific lawful basis we rely on when processing your Personal Data, please contact us. Generally, we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us using the details below.

### **Marketing**

We aim to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising. As part of our ongoing marketing activity, we may use your Personal Data in the following ways:

- **Promotions.** We may process your Identity Data, Contact Data, Usage Data and Profile Data to understand we think you may want, need or may be of interest to you. We do this in order to provide you with relevant investment opportunities.

You will receive marketing communications from us if you have requested information from us, with us or if you have provided us with your Personal Data to receive marketing promotions and have not opted-out of receiving marketing communications from us.

- **Third Party Marketing.** We will request your express opt-in consent before we share your Personal Data with a third-party for marketing purposes.



- **Opting Out.** You may request that we or third parties stop sending you marketing messages at any time by contacting us or by following the opt-out links on any marketing messages sent to you. If you opt-out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase or experience or any other transactions.

### **Change of Purpose**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, which is compatible with the original purpose. You may request an explanation of how the processing of your Personal Data for the new purpose is compatible with the original purpose by contacting us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so. Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is permitted or required by law.

### **Disclosures of Personal Data**

As part of fulfilling our contractual obligations we may have to share your Personal Data with third party processors which includes service providers acting as processors; professional advisers acting as processors or joint controllers such as lawyers, auditors and insurers.

In addition, we may share Personal Data with third parties to whom we choose to sell, transfer, or merge parts of our business or our assets. If such a change happens to our business the new owners may use your Personal Data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

### **Transfer of Personal Data outside the European Economic Area**

We share your Personal Data across Poseidon 's business, which involves transferring your data outside the European Economic Area ("EEA") to our associated companies in the US. In addition, many of our external third parties are based outside the EEA so their processing of your Personal Data will involve a transfer of data outside the EEA.

Whenever we transfer your Personal Data outside of the EEA, we ensure appropriate actions will be taken to ensure that your privacy and confidentiality rights are respected and that a similar degree of protection is afforded to your Personal Data by ensuring one of the appropriate safeguards set out in Article 46 of the General Data Protection Regulation is provided. For example, but not limited to; auditing the provider, verification of the provider's participation in an appropriate cross-border scheme such as the EU-US Privacy Shield or contractually.



## Data Security

We have put in place commercially reasonable security measures to protect your Personal Data from your computer to our Website and prevent such information from loss, misuse, unauthorised access, disclosure, alteration, or destruction. In addition, we limit access to your Personal Data to those employees, agents, contactors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and remain subject to confidentiality obligations.

Unfortunately, the transmission of Personal Data 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 Website; any transmission is at your own risk. We have put in place procedures to deal with any suspected Personal Data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Data Retention

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances, you may ask us to delete your Personal Data (see “Your rights” below).

We may anonymise your Personal Data (so that it can no longer be associated with you) in certain instances for research or statistical purposes and to help us develop and improve our services. In these circumstances, we may use your Personal Data indefinitely without further notice to you.

## Your rights

You have a number of rights concerning the way that we use your Personal Data. At any time, you have the right to:

- **request access to your Personal Data.** This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **request correction of Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected. Please note, we may need to verify the accuracy of any new details you provide.
- **request erasure of your Personal Data.** This enables you to ask us to delete Personal Data where there is no good reason for us continuing to process it. This may also apply where you have successfully exercised your right to object to processing (see below), where we may have processed your data unlawfully or where we are required to delete your Personal Data to comply with local law. Please note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.



- **object to processing.** This enables you to object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your personal situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **withdraw consent.** You may withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **request to transfer data.** This enables you to request the transfer of your Personal Data to you or a third party. We will transfer the data in a structured, commonly used, machine readable format. This right applies only in respect of automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

## Contact Information

Poseidon is the “data controller”, that is, the company responsible for, and which controls the processing of, your Personal Data collected in accordance with this Privacy Policy. If you have any questions, concerns or comments about this Privacy Policy, wish to exercise any of your rights or if you wish to contact Poseidon (and its data protection officer) about the personally identifiable information held about you, please write to us or email us with the details below:

**Address:** North Lab Annexe 1, Technical Development Area, the Wilton Centre, Redcar, UK TS10 4RF

- **Email:** [info@poseidonplastics.com](mailto:info@poseidonplastics.com)

If you have any concerns about our use of your information, you also have the right to make a complaint to the Information Commissioner’s Office, which regulates and supervises the use of Personal Data in the UK, via their helpline on 0303 123 1113. We would appreciate the opportunity to address your concern so please contact us in the first instance.

SIGNED ON BEHALF OF THE BOARD

DocuSigned by:  
  
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EXECUTIVE CHAIRMAN

3/3/2021

DATE