



Non-Employees - Privacy Notice

Introduction

The OTL Group is a group of registered companies that manufacture and design high performance, innovative and niche solutions. The OTL Group covers the following companies and divisions:

- Oil Technics (Holdings) Ltd. (Parent Company) [also known as the OTL Group]
 - Oil Technics Ltd.
 - Oil Technics (Fire Fighting Products) Ltd.
 - Aberdeen Foam
 - Foam Testing Services
 - Bio Technics Ltd.
 - Endurocide®

This Privacy Notice is issued on behalf of the OTL Group of Companies, so when we mention “the OTL Group”, “we”, “us” or “our” in this Privacy Notice, we are referring to the relevant company in the OTL Group responsible for processing your data.

We take the privacy of the data provided to us very seriously. Please read the following carefully to understand our views and practices regarding your personal data and how we will process it. This Privacy Notice explains what personal data the OTL Group collects from you as a customer, supplier, partner or interested party of the Company and how we use this data. Please note that if you are an employee of the OTL Group a separate Employee Privacy Policy is available on request from your Line Manager.

Topics Covered

Please select the topic you want to view:

- [What information we collect about you](#)
- [How we use the information collected](#)
- [How long we keep your data](#)
- [What information we share](#)
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What information we collect about you

The OTL Group collects data to operate effectively and provide you with the best customer experience and knowledge of our products.

The basic personal data the OTL Group collects includes:

Visitors to our website:

BMS-MC-PO-004 (Part of a Portfolio of Documents)

Last Reviewed: Please refer to included Portfolio Contents Page



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As a visitor to our sites, you can engage in many activities without providing any Personal Information. If we do want to collect personally identifiable information, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Information you give us:

When you submit information on our site, such as a questionnaires; requests for Technical or Sales information; or purchase products etc., we may collect the following Personal Information from you:

- Contact information such as your name, phone and fax numbers, address and email address; and
- Billing information, such as card type, billing address of your credit card etc.;
- Demographic information such as your job title, job description and company name and company type; and
- Profile data, such as details about your purchases and your Marketing preferences etc.
- We will provide 'Just in Time' notices on the data you are providing, to ensure you are aware of our data policies before you submit any information.

Automatic Information:

In addition to the information we may collect from direct submissions you make on our site, we may also collect other automatic information. For example, when someone visits the following sites, or any of our other associated domains:

- www.oiltechnics.com
- www.firefightingfoam.com
- www.foamtesting.com
- www.biotechnics.co.uk
- www.bio-technics.com
- www.endurocide.com
- www.shop.endurocide.com
- www.the-otlgroup.com

We use a third party, Google Analytics, to collect standard internet log information and details of visitor behaviour and browsing patterns etc. We do this to find out things such as the number of visitors to the various parts of the site. This information is only used in aggregate form only, which does not identify anyone. This type of aggregate data allows us to better manage our relationships with our users with the aim of providing a more targeted and dedicated service. For more information on Google Analytics, please see their [Privacy Notice](#).

Cookies:

Please see our [Cookies](#) page for more information about how we use Cookies.

Search engine:

Our website's search facility is powered by SilverStripe. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected.

Online Shops:

Our online shops are provided & hosted via Shopify. Shopify may collect data on your usage on its site. Please refer to Shopify's [Privacy Policy](#) for more information.

Newsletter Sign ups & Contact Forms:

When a user signs up for our Newsletters, or sends information on our Contact Forms, depending on the services opted into, personal information may be stored on our systems. We use JotForm as our online form generator. This data is stored in Europe and Jotform employees do not have routine access to the information stored on our



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account. Within the OTL Group, select, trained employees have access to the data submitted via Jotform. For more information, please see JotForm's [Privacy Policy](#).

Where you may have provided your specific consent to receive marketing communications by email, then we will include you in any email marketing campaigns that we believe you will be interested in, based on the interests you indicated, or past purchasing history.

As a business-to-business customer, should you purchase products from us, we may contact you about your purchase and future offers relating to the product(s) you purchased.

We use a third-party provider, MailChimp, to send marketing campaigns and we gather statistics around email opening, click rates and other industry standard technologies to help us monitor and improve our communications. This data is stored in Europe and MailChimp employees do not have routine access to the information stored on our account. Within the OTL Group, select, trained employees have access to the data on our MailChimp Account. For more information, please see MailChimp's [Privacy Policy](#).

You can always at any time change how you receive marketing emails from us, by using the unsubscribe button, found at the bottom of any marketing emails we send to you.

Emailing us

Emails, 'Contact Us' forms, or 'Technical Support' requests are sent to the OTL Group by email and stored on our secure CRM database, which can be accessed by any of the OTL Group's employees if they need to contact you by letter, telephone or email.

We may monitor any emails sent to us, including file attachments for viruses or malicious software. Are emails are scanned by Mimecast before we send/receive. For more information on Mimecast, please see their [Privacy Policy](#).

We use a third party, Exclaimer, to put outbound signature messages on our emails. For more information on Exclaimer, please see their [Privacy Policy](#).

Social Media:

If you send us a private or direct message via Social Media to one of our Corporate Social Media Accounts, the message will be stored by the respective social media platforms, please refer to their specific Privacy Policies for more information. Messages may be shared internally with staff responsible for managing these accounts, but will not be shared with any other organisations.

IP Addresses:

As is true of most websites, when you use our site and contact submission forms we may collect information about your computer, including your IP address, operating system and browser type, for system administration and to report aggregate information only.

How we use the information collected

We will only use your personal information when the law allows us to and as such we must have a legal ground for doing so. The following are some of the (amongst others) legal grounds by which we may use your personal information:

- Where we need to perform the contract we have entered into with you, or to take steps to enter into a contract with you



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- Where we need to comply with a legal obligation to which we are subject
- Where it is in pursuit of our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where you have provided us with your consent for us to do so

Some examples of how we could use your personal information include (this is a non-exhaustive list):

Business customers:

- Your contact details – in pursuit of our legitimate interests (to facilitate business between your organisation and ours)
- Your contact details to provide you with further information on our products and services. This may include technical information and/or marketing information – in pursuit of our legitimate interests (keeping you informed about our products, services and business updates)
- Your contact details – to perform our contract with you or to take steps to enter into a contract with you or in pursuit of our legitimate interests (to facilitate business between you, your organisation or a third party and us)
- Dealing with your enquiry made via our website – in pursuit of our legitimate interests to ensure your enquiry is dealt with promptly and efficiently
- To manage your customer account – in pursuit of our legitimate interests (to facilitate business between your organisation and ours)
- To provide your organisation with our products and/or services – in pursuit of our legitimate interests (to facilitate business between your organisation and ours)

Individual / Sole Trader customers:

- Your contact details – to perform our contract with you or to take steps to enter into a contract with you or in pursuit of our legitimate interests (to facilitate business between you, your organisation or a third party and us)
- Dealing with your enquiry made via our website – in pursuit of our legitimate interests to ensure your enquiry is dealt with promptly and efficiently
- Your contact details to provide you with further information on, or changes to, our products and services. This may include technical information – to perform the contract with you or to take steps to enter into a contract with you. This may also include marketing information – where you have provided us with your consent for us to do so
- To provide you with our products and/or services – to perform our contract with you or to take steps to enter into a contract with you or in pursuit of our legitimate interests (to facilitate business between you, or a third party and us).

How long we keep your data

The OTL Group retains personal information for as long as necessary, or permitted in respect to the purpose(s) for which it was obtained.

We assess the appropriate retention period for different information based on the size, volume, nature, and sensitivity of that information; the potential risk of harm to you from unauthorised use or disclosure of that information; the purposes for which we are using that information; applicable legal requirements for holding that information, and whether we can achieve those purpose(s) through other means.

Records are kept in accordance with our retention policy. For example, if you have indicated consent to receive Marketing communications, then we will keep your personal data for as long as your consent remains in place. If you later withdraw your consent, your details will be removed to a Suppression List so that you are not contacted again and any other applicable files will be archived or destroyed in accordance with our retention policy.



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What information we share

We NEVER sell or rent any of your personally identifiable information to third parties.

However, we may need to disclose or share certain information to third parties in order to fulfil our duties to you. This is only done as disclosed in this Privacy Notice and we require third parties to respect the security of your personal information and treat it in accordance with the law.

We may share your personal information with, amongst others, the following types of third parties:

- Providers which help us with delivery solutions, such as couriers and haulage companies
- Providers which help us with payment, invoicing and fraud prevention solutions, such as Invoice Factoring services, Accounting programs, or online payment providers such as Stripe or Shopify
- Providers or programs which assist us with Marketing, for example in sending newsletters or marketing campaigns etc. Or, in providing analytical information to help us improve our services
- Providers which host our websites (these are all within the UK)
- Third party software hosting companies which provide us with software solutions such as our customer relationship management systems, online presentations, online forms or questionnaires and our email facilities etc.
- Providers which facilitate online payment for goods on our websites and ecommerce shops
- Providers which assist us in our IT systems, server protection and back up procedures, including disaster recovery and insurance
- Providers which help us collate and organise customer data effectively and securely
- Accredited auditors who check our systems for our compliance in accordance with our Financial obligations and our obligations under accreditations such as ISO 9001 and ISO 14001
- Our overseas manufacturing partners.

Where we store your data

Electronic and paper versions of your personal information are stored on our servers and in our offices within the UK.

Where we use third party service providers to assist us, your personal information may also be stored in accordance with their practices and procedures. We require third parties to respect your personal information and to treat it in accordance with the law.

We do not send Personal Data out of the EEC area.

Job Applicants

All of the information you provide during the job application process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes.

We will use the contact details you provide us to contact you in order to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

For full details on the protection of your personal data in relation to our recruitment process, please read our Job Applicants Privacy Notice, which is available on request by contacting: jobs@oiltechnics.com



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Information requested:

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it might affect your application if you don't.

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.

We sometimes use external recruitment websites and/or recruitment agencies to post our job vacancies, please refer to their Privacy Policies for more information before submitting any data to the OTL Group.

Also, from time to time third party job recruitment agencies may be used to provide cover for temporary positions. Although individuals will remain employees of the agency at all times, personal information may be shared between the agency and the OTL Group to assess an employee's suitability for employment etc. Please refer to the agency directly for a copy of their Privacy Policy. All individuals working at the OTL Group (either as an agency worker or OTL Group employee) are subject to the same Company Data Protection Guidelines & Policies.

Assessments:

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by the OTL Group.

If you are unsuccessful in your job application, we may ask if you would like your details to be retained on record, in case of any future vacancies. If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for one (1) year following the closure of the job recruitment process.

Offer of employment:

Before beginning any job with the OTL Group, you will be asked for information so that we can carry out pre-employment checks. We are required to confirm the identity of our staff, their right to work in the UK and seek assurances as to their trustworthiness, integrity and reliability. You may be asked to provide:

- Proof of your identity – we will take copies for our Employee Records
- Proof of your qualifications and training – we may take copies for our Employee Records
- Referees for us to contact to directly obtain references
- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work

Decisions about recruitment:

Final recruitment decisions are made by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account.

You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing: jobs@oiltechnics.com.

Full details relating to job applications is laid out in our Job Applicants Privacy Notice, which is available on request from: jobs@oiltechnics.com.



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Your Rights & Subject Access Requests

Under the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA), you have rights as an individual which you can exercise in relation to the information we hold about you. You can read more about these rights on the Information Commissioner's Office (ICO) website, please click [here](#).

Under certain circumstances, by law you have the right to:

- Request access to your personal information
- Request correction of your personal information. This enables you to have any incomplete or inaccurate personal information corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. Please note, in some circumstances we will not be able to fully delete all your information. For example, where we have a legal obligation to retain information for a certain period or, if to delete your record would risk you being contacted again at a future date by our systems. In this circumstance we would move your data to a Suppression List, so that you are not contacted again.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the transfer of your personal information to another party.

If you want to review your personal information that we hold, you can make a Subject Access Request (SAR), by completing our SAR online form, which can be accessed by clicking [here](#). Or alternatively, please contact: privacy@oiltechnics.com.

If you want to verify, correct or request erasure of your personal information; object to the processing of your personal information; or request that we transfer a copy of your personal information to another party; please contact our Data Compliance Officer in writing at: privacy@oiltechnics.com or using the address details set out at the bottom of this Privacy Notice.

Full details are available in our Subject Access Request Policy and our Your Rights in Relation to Your Data Policy, both available on request at: privacy@oiltechnics.com.

No fee usually required:

We will normally not charge a fee for SARs, or to exercise any of your other rights under the DPA. However, if the request is manifestly unfounded, excessive, or if it is repetitive, or if you request further copies of the same information/data, we may request a fee. This fee must be paid in order for us to comply with the request. The fee will be reasonable and will be determined at the relevant time and will be set at a level which is reasonable in the circumstances to cover our administrative costs.

Right to withdraw consent:

In the limited circumstances where you may have provided your consent to the collecting, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.



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To withdraw your consent, please contact our Data Compliance Officer in writing at: privacy@oiltechnics.com or using the address details set out at the bottom of this Privacy Notice.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

Contact details, including email and mailing addresses supplied to the OTL Group allow us to keep in contact with our customers and keep them informed of important developments and updates to our product range, services, websites and policies. However, where we are providing you with marketing information, you can always change your marketing preferences by using the unsubscribe button at the bottom of any marketing emails we send to you.

Right to complain:

Your personal information is important to us and therefore we take any complaints we receive about the processing of your personal information very seriously.

This Privacy Notice was drafted with brevity and clarity in mind and as such it does not provide exhaustive detail of all aspects of the OTL Group's collection and use of personal information and the extensive policies we have in place to cover our responsibilities under the DPA. However, we are happy to provide any additional information or explanation needed.

If you wish to complain about the OTL Group's record of your personal data, please contact our Data Compliance Officer who will investigate further. You can contact in writing at: privacy@oiltechnics.com or by using the address details set out at the bottom of this Privacy Notice.

If you are not satisfied with the Data Compliance Officer's response, or believe that we are processing your data incorrectly, you can complain directly in writing to the organisation with oversight of our processing, which in the UK is the Information Commissioner's Office (ICO).

You can contact the ICO at:

Information Commissioner's Office

Wycliffe House, Water Lane,

Wilmslow,

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745

Security

We go to lengths to ensure that any personal data under our control has robust and up-to-date security protocols in place to protect it. We also seek to use reasonable organisational, technical and administrative measures to protect any data stored in both an online and/or physical environment. These systems and protocols are regularly reviewed and tested to ensure that they remain fit for purpose.

However, unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please notify us immediately by emailing: privacy@oiltechnics.com.



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Children

We do not intend to solicit or collect Personal Information from anyone under the age of 18. If you are under 18, please do not enter information on our websites or engage our services.

Links to other websites

This Privacy Notice does not cover links within our sites that link to other external, non-OTL Group websites. We encourage you to always read the privacy statements on the other websites you visit. Any available links are provided as a convenience and for informational purposes only; they do not constitute an endorsement or an approval by the OTL Group of any of the products, services or opinions of the corporation or organization or individual. The OTL Group bears no responsibility for the accuracy, legality or content of the external site or for that of subsequent links. Please always contact the external site for answers to questions regarding its specific content. Please always check that links are fit-for-purpose before clicking on them.

Changes to this Privacy Notice

We may change, modify, add or remove portions of this Privacy Notice at any time, and any changes will become effective immediately.

Any changes we make to our Privacy Notice will be posted on this page and, where appropriate, notified to you.

This Privacy Notice is part of a portfolio of GDPR & Data Protection Documents. For details on when this Privacy Notice was last updated, please contact: privacy@oiltechnics.com.

Contact Details

Our offices are at:
Linton Business Park
Gourdon, Aberdeenshire
DD10 0NH
Scotland, UK

Any questions regarding this policy should be directed in writing to our Data Compliance Officer at:

- Email: privacy@oiltechnics.com
- Tel: +44 (0) 1561 361515

Our Information Commissioner's (ICO) Registration numbers are:

Oil Technics Ltd.	ZA394469
Oil Technics (Fire Fighting Products) Ltd.	ZA394633
Bio Technics Ltd.	Z8649768