# Indium Corporation Privacy Policy Update

# INDIUM CORPORATION PRIVACY POLICY

Indium Corporation recognizes the importance of protecting your privacy. This Privacy Policy describes how Indium Corporation collects, stores, and uses your personal data.

## What is Personal Data?

Depending on the service you request, we may collect data such as name, email address, mailing address, phone number, company name, and job title.

We also collect website usage information using cookies to provide us with details related to your use of our website, email communications, or other electronic interactions you have with us and our social media sites. Information we track may include your IP address, operating system, hardware, and mobile network information.

## What We Collect

We collect personal data when you:

- Place an order
- Complete a form requesting assistance
- Download content
- Register to use one of our online calculation tools
- Comment on one of our blog posts
- Connect with us via social media.
- Visit us at an industry event.

## How We Use It

We use the information described above to:

- Process your order and manage your account
- Improve our services to personalize your repeat visits to our website
- Contact you to deliver information we think may be of interest to you
- Enhance the security of our network and information systems
- Determine the effectiveness of our campaigns and advertising

When contacting individuals who reside in the European Union, we comply with the requirements of the Data Protection Act 2018 (DPA18). To do this we rely primarily on the **legitimate interests** of the company and, for the purposes of marketing communications to non-customers, **consent** as a lawful basis to contact you. This consent will be via an opt-in check-box on our online "contact us" forms and trade show lead forms.

In carrying out our business, including our obligations to you, we may also use sub-contractors. These will include website hosting services, software providers, payroll processors, and marketing agencies. We will ensure that they respect your privacy and abide by all data protection laws.

Where we process your personal data based on your consent, you have the right to withdraw that consent at any time without reason. You can opt-out by using the unsubscribe/opt-out of any marketing communication we send to you or contact our Data Protection Officer at DPO@indium.com. You can also write to us at:

Data Protection Officer Indium Corporation 34 Robinson Rd. Clinton, NY 13323 USA

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### **Data Retention**

We keep your personal data in connection with the products and services you have purchased from us for accounting, legal, and tax purposes. This time period can vary based on geographic location and is often a requirement of our customers and regulatory authorities. Please contact us if you have any questions about our data retention policy.

In terms of personal data we use for marketing, we will keep this data for as long as we are able to market to you and if you withdraw your consent or opt-out of marketing communications, we will keep your contact details only to ensure that we do not contact you again for marketing purposes.

### For UK and EU Residents

As part of our processing activities, we may transfer your personal data to the United States of America (USA). We will ensure that we have written agreements with our data processors to ensure we comply with the DPA18. If you are unhappy with any aspect of our handling of your data you can make a complaint to the Information Commissioner's Office at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>.

#### Marketing

We would like to use your personal data to send you details of products or services that we offer that we have identified as likely to be of interest to you. We will only send you information in line with the preferences you indicated when you provided the personal data.

If at any point you would like to opt-out of receiving communications from us, or would like to change the channels (such as email or post) that we use to contact you, please contact our Data Protection Officer at <u>DPO@indium.com</u>.

#### Cookies

Cookies are pieces of information that some websites transfer to a visitor's web browser when first visiting any pages on our website. They are used for record-keeping purposes and to make website navigation easier by performing certain functions, such as saving passwords relevant to the site, remembering personal preferences, or analyzing how well our website is performing. They even help us to recommend content we believe would be most relevant to you.

Browsers are usually set to accept cookies; however, if you prefer not to receive cookies, you typically have the option of resetting your browser to refuse them. If you want to know how to do this please look at the menu on your browser, or look at the instruction on <a href="http://www.allaboutcookies.org/">http://www.allaboutcookies.org/</a>. Please note, however, that if your browser is set to refuse cookies, it is possible that some of the functionality offered by our website will not be available or work as effectively for you.

### Your Rights

You have rights in respect to your personal data. If you want to exercise any of these rights, please contact our Data Protection Officer at <u>DPO@indium.com</u>.

**The right to be informed** – you have the right to be told about the collection and use of the personal data you provide. This privacy policy sets out the purpose for which we process your personal data, how long we will keep your data, who we will share your data with.

**Right of access** – you have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request.

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**Right to rectification** – you have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request.

**Right to erasure** – this right, often referred to as the right to be forgotten allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request.

**Right to restrict processing** – you have the right to ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request.

**Right to object** – you have the right to object to our processing of your personal data based on legitimate interests or for direct marketing.

## **Third Party Websites**

Our website includes links to other websites that may have privacy practices that differ from those of Indium Corporation. Our Privacy Policy does not apply to those other sites. If you submit personal information to any of those sites, your information is governed by the privacy statements specific to those sites.

## Changes to our Privacy Policy

We will review our Privacy Policy from time-to-time. Any policy changes will be posted on our website. If we make any significant changes to the policy, we will communicate these to you.

## How to contact us

Please contact us if you have any questions about our Privacy Policy or information we hold about you.

- Email: DPO@indium.com
- Mailing address: Data Protection Officer, Indium Corporation, 34 Robinson Road, Clinton, New York, USA 13323

This Privacy Policy is effective May 25, 2018.