



## GDPR TW Metals Privacy Notice

Revision: 1.2

### Who We Are

**TW Metals LLC** (*'we' or 'us' or 'our'*) gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

TW Metals' principal place of business is 707 Eagleview Boulevard, Suite 200, Exton PA, USA 19341

### Information That We Collect

**TW Metals** processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

#### The personal data that we collect from you is: -

- Name
- Business Address
- Business Email Address
- Business Telephone Number(s)

#### We collect information in the below ways: -

- If you contact us via post, email, fax or telephone and provide any personal data
- If, where applicable, you visit or browse our website in accordance with our cookie policy at the end of this notice
- If you complete an online contact form
- If you provide your contact details to us when registering to use an online account or portal for accessing your order history
- Order history and any relevant business documentation (such as but not confined to purchase orders, order acknowledgements, product conformity certificates) that contain your personal data as related to your business function.

### How We Use Your Personal Data (Legal Basis for Processing)

**TW Metals** takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law.

We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. We do not collect any information from anyone under 13 years of age and our website, products and services are all directed to people who are at least 13 years old or older.

We **do not** ask you to sign up to any marketing or mailing lists and will only contact you after placing an order as part of our contractual service to you.

Processing for any purpose other than those specified in this policy are only done with your consent, which you are free to withdraw at any time.

Where applicable and if you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

**The purposes and reasons for processing your personal data are detailed below: -**

- We collect your personal data in the performance of a contract to provide you with our products and services and to ensure that orders are completed and can be sent out to your preferred address
- We use your personal information to answer your questions and provide industry specific advice
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We may occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests
- We may also contact you for feedback on your use of our products, services or our website and may need to use your information to send important notices, such as updated document content where there have been regulation/law revisions or changes to our terms, conditions and policies.

## Your Rights

By law you have the right to access personal information that TW Metals processes about you and to request information about: -

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

Your rights above can be affected by the lawful basis applied to the processing of your data and the following shows which **will not** apply

Lawful Basis for Processing	Right to Erasure	Right to portability	Right to object
Consent			X (but right to withdraw consent)
Contract			X
Legal Obligation	X	X	X



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<b>Vital Interests</b>		<b>X</b>	<b>X</b>
<b>Public Task</b>	<b>X</b>	<b>X</b>	
<b>Legitimate Interests</b>		<b>X</b>	

Each of these rights are supported by appropriate policies & procedures that allow the required action to be taken within the timescales stated in the GDPR

Data Subject Request	Timescale
The right to be informed	Supplied by data subject: When data is collected Not supplied by data subject: Within one month
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of rejection
Rights in relation to any automated decision making & profiling	Not currently applicable

Any requests should be made in writing to the Manager of Compliance:

**Kristina Satchell**  
**TW Metals LLC**  
**27 Englehard Drive**  
**Monroe Township, NJ 08831**

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## Consent

We do not currently rely on consent as the lawful basis for processing your personal data but if we do rely on this for our legal basis in the future, we will request your consent to positively opt-in prior to obtaining and processing your personal data and will clearly stipulate the type of data, the purpose for processing it and the ways in which it will be used.

Records of consent will be kept and you have the right to withdraw consent at any time you choose.

### Consent obtained by form

If gaining consent in person, this will be given as a signature, provided along with the Privacy Notice and any T&C's (*both separate from the consent form*).

Once signed consent is given, this is filed with a copy of the Privacy Notice and any other information provided to the data subject at the time of consent.



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**TW Metals** take your privacy seriously and will only process your personal data with your consent and in accordance with the terms stated in our Privacy Notice. If you consent to us collecting and processing your personal data, please sign below: -

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Time: \_\_\_\_\_

Date: \_\_\_\_\_

I confirm that I have been provided with a copy of **TW Metals'** Privacy Notice & Terms & Conditions prior to giving consent

### Consent obtained by online/electronic format

If consent is obtained via an online/electronic format, the template below will be used with the system/applications settings to ensure evidence of the consent, time, date and what information the data subject was provided with at the time (i.e. Privacy Notice, T&C's etc)].

Any opt-in boxes will remain unticked until completed by the individual.

**TW Metals** take your privacy seriously and will only process your personal data with your consent and in accordance with the terms stated in our Privacy Notice. If you consent to us collecting and processing your personal data, please complete tick below: -

I [**insert data subject name**] consent to you processing my personal data as detailed in your Privacy Notice:

## Legitimate Interests

As noted in the '*How We Use Your Personal Data*' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing:

- Your contact details to:
  - Administer your account and enable us to fulfil contractual obligations to you
  - Provide details or information that have been expressly requested by you
  - For communication between us for business purposes including, where appropriate, any relevant updates to similar products or services previously purchased.
- Your personal data including the use of CCTV when you are a visitor to TW Metals to ensure your security and Health & Safety whilst on site
- Your personal data if acting as an emergency contact for a TW Metals employee to ensure the Health and Welfare of our staff (and following their sharing of your data with us)

## Sharing and Disclosing Your Personal Information

We share your information for the purposes specified in this notice - with our core service providers and third party platforms as required for our business to function; for example, picking, packaging and



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processing orders, fulfilling deliveries, customer support, fraud detection, credit risk reduction checks, IT systems support, and internal audits.

In some cases, the third parties may require access to some or all of your data.

Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of our business with you including data on sales and other information. All such data will be anonymized and will not include any personally identifying data, or any anonymized data that can be combined with other data and used to identify you.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

All processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

### Safeguarding Measures

TW Metals takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including (in line with the IT Security Policy):

#### Manage the Network Perimeter

- Measures are deployed to limit access to network ports, protocols and applications filtering and inspecting all traffic at the network perimeter to ensure that only traffic which is required to support the business is being exchanged. All inbound and outbound network connections are controlled and managed. Technical controls are deployed to scan for malware and other malicious content.
- Firewalls are deployed to form a buffer zone between the untrusted external network and the internal network used by the business. The firewall rule is set to deny traffic by default and a whitelist is applied that only allows authorized protocols, ports and applications to communicate with authorized networks and network addresses. This measure reduces the company's exposure of ICT systems to network based attacks.
- Antivirus and malware checking solutions are deployed to examine both inbound and outbound data at the perimeter in addition to antivirus and malware protection that is deployed on internal networks and on host systems.

#### Protect the Internal Network

- Measures are deployed to ensure that there is no direct network connectivity between internal systems and systems hosted on untrusted networks (such as the Internet), which limits the exposure of internal systems to network attacks from the Internet. Network traffic is monitored to detect and react to attempted or actual network intrusions.
- All wireless access points are appropriately secured and only allowing known devices to connect to corporate Wi-Fi services. Wireless security scanning tools detect and locate unauthorised wireless access points.
- Administrator access to any network component is properly authenticated and authorized. All default administrative passwords are changed on a regular basis.
- Ensure that error messages returned to internal or external systems or users do not include sensitive information that may be useful to attackers.
- Network intrusion detection and network intrusion prevention is deployed on the network and configured by qualified staff to monitor traffic for unusual or malicious incoming and outgoing activity that could be indicative of an attack or an attempt. Alerts generated by the system are promptly managed by appropriately trained staff.

## Transfers Outside the EU

**TW Metals** transfers personal data outside of the EU for the below purposes: -

- Authorizing names and job titles that are contained within certificates of product conformity and that must accompany sold goods

Where we transfer personal information for the above reasons, we utilize the below safeguarding measures and mechanisms to ensure that your personal data is always safe and secure: -

- restricted access
- IT authentication
- Firewalls
- anti-virus/malware

## How Long We Keep Your Data

**TW Metals** only ever retains personal information for as long as is necessary and in accordance with the requirements of our business. We have a retention & erasure policy in place to meet these obligations in line with the legal requirements of the country your branch is in.

For any personal data processing where we request your consent to us using your details, we will keep such data until you notify us otherwise and/or withdraw your consent.

## Consequences of Not Providing Your Data

Where we are relying on statutory/contractual requirement as our legal basis for processing your data, you are not obligated to provide your personal information to **TW Metals**, however, as this information is required for us to provide you with our products/services and meet our business obligations, we will not be able to provide you with our products/services without it.



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### Cookie Notice

A **'cookie'** is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimize user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <https://www.aboutcookies.org>.

### Marketing

#### Legitimate Interests

**TW Metals** will occasionally send you **products/services/promotions** by **email/SMS/post** that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out/unsubscribe at any time.

### Lodging A Complaint

**TW Metals** only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint.

Any objections should be made in writing to the Manager of Compliance:

**Kristina Satchell**  
**TW Metals LLC**  
**27 Englehard Drive**  
**Monroe Township, NJ 08831**

If you remain dissatisfied then you have the right to appeal directly to the Information Commissioner for a decision.