



# data protection supplier and website privacy notice

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Who is the Document for:	Users of the px website and third party representatives				

## 1. INTRODUCTION

This privacy notice explains what happens with any Personal Data we gather from you in relation to:

- Your, or your employer's dealings with us, or an organisation for whom we act as agent; or
- Your use of our website; or
- Your use of our Data Room(s).

Personal Data means any information about you from which you can be identified, it does not include any data from which your identity has been removed.

We recognise our obligations under data protection legislation and we are committed to keeping your Personal Data safe and secure.

You should read this notice so that you understand how we will handle your Personal Data. Our aim is to only use and hold your Personal Data in the way you'd reasonably expect us to. We reserve the right to amend this privacy notice from time to time. Where we do amend this notice we will make sure that the changes are notified to you.

## 2. GUIDANCE

### 2.1 WHO WE ARE

We are px group, a fully integrated infrastructure solutions business delivering improved operations performance of commercial and industrial facilities. We have several UK based companies the following of which might hold and process your Personal Data:

- PX Limited, a company registered in England and Wales under Number 04373756, our registered office is at PX House, Westpoint Road, Stockton On Tees, TS17 6BF. Registration number with the Information Commissioner's Office is Z7102665.



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- PX Holdings Limited, a company registered in England and Wales under Number 04417010, our registered office is at PX House, Westpoint Road, Stockton On Tees, TS17 6BF. Registration number with the Information Commissioner's Office is Z7102711.
- PX (TGPP) Limited, a company registered in England and Wales under Number 04416996, our registered office is at PX House, Westpoint Road, Stockton On Tees, TS17 6BF. Registration number with the Information Commissioner's Office is Z7102742.
- PX Engineering Consultants Limited, a company registered in England and Wales under Number 05692095, our registered office is at PX House, Westpoint Road, Stockton On Tees, TS17 6BF. Registration number with the Information Commissioner's Office is Z3442596.
- Energy24 Limited, a company registered in England and Wales under Number 05809051, our registered office is at PX House, Westpoint Road, Stockton On Tees, TS17 6BF. Registration number with the Information Commissioner's Office is ZA076451.
- Saltend Chemicals Park Limited, a company registered in England and Wales under Number 10542068, our registered office is at PX House, Westpoint Road, Stockton On Tees, TS17 6BF. Registration number with the Information Commissioner's Office is ZA389927.
- Coulomb Energy Supply Limited, a company registered in England and Wales under Number 7488842, our registered office is at PX House, Westpoint Road, Stockton On Tees, TS17 6BF. Registration number with the Information Commissioner's Office is ZA390015.
- Camm-Pro Limited, a company registered in England and Wales under Number SC545876, our registered office is at PX House, Westpoint Road, Stockton on Tees, TS17 6BF.

We might hold and process your Personal Data in our capacity as agent for the following companies:

- Teesside Gas & Liquids Processing a company registered in England and Wales under Number 02767808 whose registered office is at Suit 1 3<sup>rd</sup> Floor, 11-12 St. James's Square, London, SW1Y 4LB.
- NSMP Operation Limited a company registered in England and Wales under Number 09711370 whose registered office is at Suit 1 3<sup>rd</sup> Floor, 11-12 St. James's Square, London, SW1Y 4LB.

We might also transfer your Personal Data to our group companies as set out in section 2.11 of this notice. If you have any questions regarding this notice, how we process Personal Data gathered about you, or require a list of our group companies who may process your Personal Data please contact us using the details below:

Data Protection Representative at:  
email [dataprotection@pxlimited.com](mailto:dataprotection@pxlimited.com);  
write to PX House, Westpoint Road, Stockton On Tees, TS17 6BF; or,  
call 01642 623000

## 2.2 WHAT DATA DO WE GATHER ABOUT YOU?

In connection with our dealings with you or your employer, we will gather the following information from you:

- contact details
- IP Address
- records of correspondence
- surveys we may use from time to time for research purposes (although you do not have to respond to them)
- details of transactions you, or your employer has made with us or a party for whom we act as agent, through our website, in writing or over the telephone and of the fulfilment of orders



- details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access
- details of your visits to our sites
- details of other dealings we have with you.

## 2.3 HOW DO WE COLLECT YOUR DATA?

We collect data about you from the following sources:-

- information you provide to us via direct interactions;
- information you provide to us including via our website, telephone or in writing
- information we generate through our observation of our interactions with you
- information your employer or others provide to us about you (for example for the purpose of performing a contract)
- credit reference agencies

## 2.4 HOW DO WE STORE YOUR DATA AND KEEP IT SECURE?

We use reasonable and up to date security methods to keep your data secure and to prevent unauthorised or unlawful access to your Personal Data, and against the accidental loss of, or damage to, Personal Data. All information you provide to us electronically is stored on our secure servers and any tangible, sensitive Personal Data is stored in secure filing systems. Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of Personal Data.

We have in place policies, processes, practices and technologies to maintain the security of all Personal Data from the point of collection to the point of destruction including processes and practices to deal with a security breach. We will ensure your Personal Data is only accessible by those who need to see your data for their specific role. We will only transfer Personal Data to a third party if that third party agrees to comply with those practices and policies, or if they put in place adequate measures themselves.

## 2.5 HOW AND WHY WE WILL USE YOUR DATA?

We will usually only process your Personal Data where you have given your consent or, where the processing is necessary:

- to comply with our legal obligations;
- at your request to consider entering into a contract with you;
- for the purpose of a contract with you; or
- to pursue our legitimate interests (or those of a third party) in operating our business effectively.

We use the data we collect about you to help us make better decisions about you and to operate our business efficiently. This may involve the following activities:

- ensuring that content from our site is presented in the most effective manner for you and for your computer
- providing you with information, products or services that you request from us (or a third party for whom we act as agent) or which we feel may interest you, where you have consented to be contacted for such purposes
- carrying out our obligations arising from any contracts entered into between you or the organisation you work for and us (or the third party for whom we act as agent)
- to assess your suitability, or the suitability of the organisation you work for, to provide services to us (or the third party for whom we act as agent)



- allowing you to participate in interactive features of our service, when you choose to do so.
- notifying you about changes to the service
- contacting you with regard to dealings between us, or an organisation for whom we act as agent.

## 2.6 WHAT ARE OUR LEGITIMATE INTERESTS IN PROCESSING YOUR DATA?

We consider that in some circumstances, the processing of your Personal Data is necessary for our legitimate interests, which include:

- ensuring our business is managed effectively

## 2.7 HOW WE KEEP YOUR DATA ACCURATE

We will keep the Personal Data we store about you accurate and up to date. We will take every reasonable step to erase or rectify inaccurate data without delay. Please tell us if your personal details change or if you become aware of any inaccuracies in the Personal Data we hold about you

## 2.8 HOW LONG WILL WE KEEP YOUR DATA?

We will not keep your Personal Data for longer than is necessary for the purpose(s) for which we process it. This means that data will be destroyed or erased from our systems when it is no longer required. For guidance on how long certain data is likely to be kept before being destroyed, contact our Data Protection Representative.

## 2.9 WHAT RIGHTS DO YOU HAVE IN RESPECT OF YOUR PERSONAL DATA?

You have the right to:

- request access to any Personal Data we hold about you
- have any Personal Data which we hold about you which is inaccurate rectified
- have incomplete Personal Data completed
- have Personal Data erased
- have the processing of your Personal Data restricted (for example, if you think the data we hold about you is inaccurate you can ask us to stop processing it, until we will either correct it or confirm it is accurate)
- be provided with the Personal Data that you have supplied to us, in a portable format that can be transmitted to another data controller without difficulty
- object to certain types of processing, including processing based on legitimate interests (see above), automated processing (which includes profiling) and processing for direct-marketing purposes, and
- not be subject to a decision that is based solely on automated processing which produces a legal effect or which has a similar significant effect for you.

If you wish to exercise any of the rights set out above, you must make the request in writing to our Data Protection Representative, whose contact details are detailed in Section 2.1 of this practice. Please note some of these rights are restricted in some circumstances.

If you have provided your consent to any of the processing of your Personal Data, you have the right to withdraw your consent to that processing at any time, where relevant. Please contact our Data Protection Representative, whose contact details are detailed in Section 2.1 of this practice, if you wish to do so.



As indicated above, we sometimes process your data on the basis of legitimate interests. You have a right to object to this processing. If you object to us processing your data based on legitimate interests, we must no longer process that Personal Data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or that the processing is required for the establishment, exercise or defence of legal claims.

## 2.10 WHO WILL HAVE ACCESS TO THE DATA WE HOLD?

Our Company Personnel (being employees, agency workers, contractors, consultants) of px and our group companies who need to access your data will view it in order that we can provide services to you. Our employees have been trained in data protection and understand the need to keep your information confidential.

In addition to our Company Personnel, we also use service providers who may hold Personal Data on our behalf (for example ICT, telecommunications and system administration service providers and professional advisors). We will carry out due diligence on our service providers and make sure we have a contract with them which satisfies the requirements of data protection legislation. Apart from Company Personnel and our service providers, we will not disclose your Personal Data to a third party without your consent, unless we are satisfied that they are legally entitled to the data. Where we disclose your Personal Data to a third party, we will have regard to our obligations under the law.

We may disclose your personal information to third parties:

- if we or substantially all of our assets are acquired by a third party, in which case Personal Data held by us will be one of the transferred assets;
- In the event that we dispose of any sites or assets for a client in which case we may disclose your Personal Data to the prospective replacement operator (if any); and
- if we are under a duty to disclose or share your Personal Data in order to comply with legal obligations or to protect the rights, property, or safety of px group, our customers, suppliers or other employees. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

You are entitled to request details of the recipients of your Personal Data or the categories of recipients of your Personal Data.

## 2.11 TRANSFERRING YOUR DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

We will not transfer your Personal Data outside the EEA unless such transfer is compliant with the law. This means that we cannot transfer any of your Personal Data outside the EEA unless:

- the EU Commission has decided that another country or international organisation ensures an adequate level of protection for your Personal Data;
- the transfer of your Personal Data is subject to appropriate safeguards, which may include binding corporate rules or standard data protection clauses adopted by the EU Commission; or
- we are otherwise permitted to do so by law (including if you explicitly consent to the proposed transfer).



## 2.12 IP ADDRESSES AND COOKIES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Our site also uses cookies. A cookie is a small file of letters and numbers that we put on your computer. These cookies allow us to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site, to improve our site and to deliver a better and more personalised service, for example by ensuring that users are finding what they are looking for easily.

There are different categories of cookies. We use Google Analytics cookies which are "analytical" type cookies. We use them to enable us:

- to recognise and count the number of visitors and to see how visitors move around our site when they are using it
- to store information about your preferences, and so allow us to customise our site according to your individual interests
- to speed up your searches
- to recognise you when you return to our site.

You may refuse to accept (or in other words, delete) cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. For more information on disabling cookies and more information on cookies generally, see <http://www.allaboutcookies.org/>.

## 2.13 RIGHT TO MAKE A COMPLAINT

If you have any issues with our processing of your Personal Data and would like to make a complaint, you may contact the Information Commissioner's Office on 0303 123 1113 or at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## 3. FURTHER READING

ICO Guide to the General Data Protection Regulation <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

## 4. REFERENCES

1. General Data Protection Regulation
2. Data Protection Act (2018)

## 5. USER FEEDBACK

Any user who identifies an inaccuracy, error or ambiguity within this document is requested to notify the Systems Coordinator so that appropriate action can be taken.



## 6. DOCUMENT HISTORY

Date of Amendment	Page/Section Amended	Revision No.	Reason for Amendment
09.10.18	All	1.0	First Issue
06.02.20	All	2.0	Reviewed - formatted, added use of data room(s) to introduction; added CAMM-Pro Limited 2.1; amended reference to procedures to practices and processes; added cross references to subsections.
21.05.20	2.10	3.0	Added 'In the event that we dispose of any sites or assets for a client in which case we may disclose your Personal Data to the prospective replacement operator (if any)' as second bullet point