



Information on the processing of Customers' and Prospects' personal data pursuant to Articles 13 and 14 of the UK GDPR

Pursuant to the current legislation on the protection of personal data (the “**Privacy Legislation**”) including EU Regulation 2016/679 (the “**GDPR**”) as transposed into United Kingdom national law by operation of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (“**UK GDPR**”), together with the Data Protection Act 2018, **Deep Sea Electronics Limited**, in its capacity as data controller (“**DSE**” or the “**Company**” or the “**Data Controller**”), informs the physical persons who represent and/or act on behalf of clients and/or potential clients (hereinafter generally referred to as the “**Data Subjects**” or “**Clients**”, or in singular the “**Data Subject**” or the “**Client**”) that in the context of the contractual or pre-contractual relationship between the Client and the Company (hereinafter, the “**Contract**”), the personal data related to the Data Subjects will be processed in strict compliance with the Privacy Legislation, for the purposes and in the manner described in this policy (the “**Policy**”).

1 Data Controller



The Data Controller is **Deep Sea Electronics Limited**, with registered office:
 Highfield House, Hunmanby Industrial Estate, Hunmanby, North Yorkshire, YO14 0PH, UK,
 VAT no. 3169 234 57, can be contacted at +44 (0) 1723 890099 or at the following e-mail address sales@deepseaelectronics.com.

2 Personal Data subject to processing



Common Data:

- identification data obtained during contractual or pre-contractual relationships with the Company, such as: name, address or other personal identification elements; company name if it contains personal data; common data of the Client’s employees and/or collaborators and/or consultants;
- contact details, such as: company e-mail, certified e-mail address, mobile phone number.

3 Source of personal data



Personal data not collected directly by the Data Controller from Clients are communicated to the Company and/or collected by or from:

- organizers of exhibitions, events and fairs who send the Company the names of those who have taken an interest in the Company;
- Agents, distributors, resellers and/or system integrators.

4 Purpose and legal basis of the processing and nature of the provision of Personal Data

 Purpose of the processing	 Legal basis for the processing	 Period of storage of personal data	 Nature of the provision of Personal Data
a) Performance of the Contract and/or pre-contractual measures such as, for example, the negotiation of contractual relationships, the formalization, stipulation and execution of the Contract.	Art. 6 (1)(b): Performance of the Contract to which the Data Subject is a party and in the performance of pre-contractual measures adopted at the request of the Data Subject.	The personal data of the Data Subjects necessary for the stipulation and performance of the Contract will be stored and processed for the entire duration of the Contract itself and, after its termination, for any reason whatsoever, for a period not exceeding 10 (ten) years (i.e. the ordinary limitation period), with reference to the data necessary for the issuance of certificates	The provision of personal data is necessary for the establishment and proper performance of the Contract, as well as to correctly comply with current legislation and the obligations arising from the Contract. Therefore, any refusal by the Data Subject to provide personal data, in whole or in part, for the pursuit of the indicated Purposes, will mean it is impossible to
b) Fulfilment of obligations provided for by law, regulations,	Art. 6(1)(c): Legal obligation to which the Data Controller is subject.		



<p>EU or UK legislation or by an order of the Authority (e.g. accounting and budgetary obligations, anti-money laundering, <i>antitrust</i>, as well as customs, tax, health, labour and safety obligations, etc.).</p>		<p>or documentation that may be required for any obligations legal, tax and accounting obligations related to or arising from the conclusion of the Contract, as well as for the legal protection of the Company.</p>	<p>establish or perform the Contract or carry out the obligations provided for by the regulations in force.</p>
<p>c) Management of obligations related to the intra-corporate and financial organization (e.g. company secretary, communications, deposits, reporting, solvency checks, etc.), as well as <i>internal reporting & controlling</i>.</p>	<p>Art. 6(1)(c): Legitimate interest of the Data Controller in the proper management of the company in relation to accounting and financial organization.</p>	<p>At the end of the identified retention period, the personal data of the Data Subjects will be deleted, unless there are further legitimate interests of the Data Controller and/or legal obligations that make it necessary, subject to minimization, to retain them.</p>	
<p>d) Organization and management of corporate events in which Clients take part, aimed at strengthening the <i>corporate identity</i>.</p>	<p>Art. 6(1)(f): Legitimate interest of the Data Controller in promoting the corporate image externally and thus strengthening its corporate identity.</p>		
<p>e) Establishment, exercise or defence of legal claims, as well as debt collection activities.</p>	<p>Art. 6(1)(f): Legitimate interest of the Data Controller relating to the right of defence and exercise of its rights or of a third party.</p>		
<p>f) Transmit personal data within the business group for internal administrative purposes through the use of software and/or applications implemented at group level (e.g. Salesforce), including the processing of Customers' personal data.</p>	<p>Art. 6(1)(f): Legitimate interest of the Data Controller in the proper internal administrative management.</p>		
<p>g) Transmit personal data within the business group– for internal administrative purposes – for <i>screening</i> Clients who are natural persons and on legal representatives of Clients who are legal persons to identify persons and/or companies with whom it is forbidden to establish commercial relations pursuant to the applicable regulations, through the use of software and/or applications implemented at group level (e.g. Amber Road).</p>	<p>Art. 6(1)(f): Legitimate interest of the Data Controller in the correct internal administrative management.</p>	<p>[·]</p>	



<p>h) Carrying out marketing and business promotion activities, such as sending the User communications, flyers or postcards on products, initiatives and events and/or services offered by the Company and/or newsletters, or other advertising, information or promotional material. Such communications and/or invitations to participate in market research or <i>customer satisfaction surveys</i> may be made by sending automated messages, e-mails, or paper mail.</p>	<p>6(1)(f): Express consent of the Data Subject.</p> <p>N.B. The Data Controller collects a single consent for the <i>marketing purposes</i> described herein.</p> <p>If, on the other hand, the Client has already provided his/her e-mail address and additional personal data when purchasing a product or service offered by the Company, such data may be used by the Data Controller, without the consent of the Data Subject, to send promotional communications of products or services similar to those previously purchased, provided that the Client has not opted out of receiving such communications. In this case, the legal basis consists of the legitimate interest of the Data Controller to carry out marketing and promotion activities of the company towards its Customers pursuant to Article 6(1)(f) of the UK GDPR.</p>	<p>The personal data of the Data Subjects processed for general marketing purposes will be kept until a request for deletion, withdrawal of consent or objection to the processing.</p>	<p>The provision of personal data processed, only with the consent of the Data Subject, for <i>marketing and promotional purposes</i> is optional.</p> <p>Any lack of consent for this Purpose will only result in preventing the processing of personal data by the Data Controller for the aforementioned Purposes.</p>
<p>i) Lead generation activities aimed at identifying a list of subjects who should be interested in a specific service and/or product through e-mail, ads, retargeting, blogs, social media, landing pages, promotions and dedicated offers.</p>	<p>See above</p>		
<p>j) Purposes of communication to third parties for the performance of their <i>marketing</i> in order to strengthen the corporate image externally and therefore for corporate <i>identity reasons</i>.</p>	<p>Art. 6(1)(a): Express consent of the Data Subject.</p>		

If the legal basis of the processing is the legitimate interest of the Data Controller, the Data Controller has carried out, or will carry out, a balancing test aimed at assessing the proportionality of the processing so that the rights and freedoms of the Data Subjects are not affected, taking into account their reasonable expectations in relation to the specific processing activity carried out.

Data Subjects may request **further information on the above assessment** by sending an e-mail to the following address sales@deepseaelectronics.com

The Data Controller also informs the Data Subject that at the time of collection and on the occasion of sending each commercial communication carried out for the pursuit of the aforementioned Purpose, he/she has the possibility to: (i) **revoke**, at any time, any consent given, it being understood that the withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal; (ii) **object** to the processing of your personal data based on the Company's legitimate interest.

In the event that the Company intends to use the personal data for any other purpose that is incompatible with the Purposes for which the data was originally collected or authorised, the Company will inform the Data Subject in advance and, where required, request his/her consent for such processing activity.



5 Recipients of Personal Data



The personal data of the Data Subjects will be processed by the Company’s employees and collaborators.

Data Subjects’ personal data may be disclosed for the Purposes listed above to additional **recipients or categories of recipients**, as independent data controllers or, where necessary, data processors specifically selected and appointed pursuant to Article 28 of the UK GDPR, including, by way of example but not limited to:

- insurance companies;
- debt collection companies;
- companies that detect financial risks and carry out fraud prevention activities;
- managers of the software and technological infrastructures used by the Data Controller, as well as providers of IT support services;
- web agencies and providers of technical services of the site;
- communication agencies and agencies for the production of photos and videos;
- consultants and freelancers in individual or associated form (accountants and accounting experts, statutory auditors, lawyers);
- suppliers of the Data Controller;
- public or private bodies and/or organizations.

Furthermore, the personal data of the Data Subjects may also be disclosed to third parties in the following cases: (i) when the communication is required by applicable laws and regulations with respect to legitimate third party recipients of communications, such as authorities and economic and non-economic public bodies that process your data as independent data controllers for their respective institutional purposes, health bodies, medical and paramedical personnel, etc.; (ii) in the event of extraordinary transactions (e.g. mergers, acquisitions, sale of companies, etc.).

The complete list of recipients of the personal data of the Data Subjects, including further details on the location of the recipients themselves, is kept at the headquarters of the Data Controller and can be requested at any time.

6 Transfer of Personal Data Abroad



The management and storage of personal data will take place on servers located within the UK or European Union, except as described herein.

DSE informs Data Subjects that, being part of an **international group**, some data may be transferred – for the Purposes referred to in point 4 of this Policy above.

The EU benefits from an adequacy decision of the UK government. Considering that the United States does not guarantee an adequate level of protection of personal data compared to that provided for in the European Union, the Data Controller has taken steps to ensure that the transfer of the personal data of the Data Subjects to this country takes place only in compliance with the conditions set out in art. 45/49 of the UK GDPR and, in particular:

- USA (entities certified under the Data Privacy Framework): Data protection adequacy for non-EU countries (europa.eu); and/or
- possible contractual agreements based on the Standard Contractual Clauses (“**SCCs**”) as developed by the European Commission pursuant to Article 46 of the GDPR as modified by the UK International Data Transfer Addendum (and you are entitled to obtain a copy of these upon request); and/or
- Binding Corporate Rules approved by the UK data protection supervisory authority.

Should the Company intend to transfer the personal data of the Data Subjects to non-UK countries other than those mentioned above, such transfer will take place only in compliance with the conditions set out in art. 45/49 of the UK GDPR.



7 Your rights



The Data Controller informs the Data Subject that, in accordance with the law, he/she will always have the right to revoke his/her consent at any time, where given (without affecting processing occurring prior to revocation), as well as to exercise, at any time, the following rights, subject to any conditions or limitations in applicable law (collectively, the “Rights”):

- a) the “**right of access**” and specifically to obtain confirmation of the existence or otherwise of personal data concerning him/her and their communication in an intelligible form;
- b) the “**right to rectification**”, i.e. the right to request the rectification or, if interested, the completion of personal data;
- c) the “**right to erasure**”, i.e. the right to request the erasure, transformation into anonymous form of data processed in violation of the law, including those whose retention is not necessary in relation to the Purposes for which the personal data were collected or subsequently processed;
- d) the “**right to restriction of processing**”, i.e. the right to obtain from the Data Controller the restriction of processing in certain cases provided for pursuant to the Privacy Legislation;
- e) the right to request from the Data Controller the indication of the recipients to whom it has notified any rectification or erasure or limitation of processing (carried out pursuant to Articles 16, 17 and 18 of the UK GDPR, in compliance with the notification obligation except in the event that this proves impossible or involves a disproportionate effort);
- f) the “**right to data portability**”, i.e. the right to receive (or to transmit directly to another data controller) personal data in a structured, commonly used and machine-readable format;
- g) the “right to object”, i.e. the right to object, in whole or in part:**
 - *the processing of personal data carried out by the Data Controller for its own legitimate interest;*
 - *to the processing of personal data carried out by the Data Controller for marketing or profiling purposes.*

In the above cases, where necessary, the Data Controller will inform the third parties to whom the personal data of the Data Subject are communicated of the possible exercise of the rights, except in specific cases in which this is not possible or is too onerous and, in any case, in accordance with the provisions of the Privacy Legislation.

It is expressly understood, as provided for in Article 21 of the UK GDPR, that in the event of the exercise of the right to object by the Data Subject, the Data Controller will refrain from further processing the personal data unless the Data Controller demonstrates the existence of compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the Data Subject or for the establishment, the exercise or defence of a right in court.

The exercise of the above Rights is not subject to any formal constraint and is free of charge. The Data Controller may eventually require the Data Subject to verify his/her identity before taking further action following the request to exercise the aforementioned Rights.

The Data Subject may at any time exercise his/her Rights in the following ways:

- by e-mail to: sales@deepseaelectronics.com;
- by ordinary mail, to the address of the registered office of Deep Sea Electronics Limited – Highfield House, Hunmanby Industrial Estate, Hunmanby, North Yorkshire, YO14 0PH, UK.

8 Complaint to the Supervisory Authority pursuant to Article 77 of the UK GDPR



You have the right to lodge a complaint with the competent supervisory authority (in particular in the Member State of your habitual residence, place of work or place of the alleged infringement), if you are of the opinion that your personal data is being processed in a way that leads to violations of the UK GDPR.

A complaint can be filed with the UK supervisory authority, the ICO, at <https://ico.org.uk/make-a-complaint/> Make a complaint | ICO.

CHANGES TO THIS POLICY

This Policy may be amended and supplemented from time to time. We invite Data Subjects to periodically check their contents. In any case, it will be the responsibility of the Data Controller to appropriately report any significant changes made to this Policy.

Document updated: 13 June 2024



Data Subject Consent Request Form

The undersigned _____ taken note of the above Information on the processing of personal data.

I agree I do not agree

to the processing of my personal data, for the Purpose referred to in Paragraph 3, letter h) for the performance of marketing and business promotion activities, such as the sending of communications, flyers or postcards on products, initiatives and events and/or services offered by the Company and/or newsletters, or other advertising, information or promotional material.

Such communications may be made by sending automated messages, e-mails, or paper mail.

I agree I do not agree

to the processing of my personal data, for the Purpose referred to in Paragraph 3, letter i) for the performance of lead generation activities aimed at identifying a list of subjects who should be interested in a specific service and/or product through e-mails, ads, retargeting, blogs, social media, landing pages, promotions and dedicated offers.

I agree I do not agree

to the processing of my personal data, for the Purpose referred to in Paragraph 3, letter j) for the communication of my personal data to third parties for the performance of their marketing activities, in order to strengthen the corporate image externally and therefore for corporate identity reasons.

[place and date]

Signature _____

N.B. Consent to the processing of personal data may be revoked at any time by sending an email to the following address: sales@deepseaelectronics.com

However, the withdrawal of consent previously given does not affect the lawfulness of processing based on consent before its withdrawal.