



CURTIS



August 2018

Curtis Website Privacy Notice

Curtis Instruments, Inc and Curtis/Balkan Limited and their group companies ("**Curtis**", "**we**" and "**us**") are committed to protecting the privacy of those with whom we interact and we recognise the need to respect and protect information that is collected or disclosed to us (called "personal information", explained below).

This Privacy Notice is intended to tell you how we use your personal information, and we've tried to explain what we do in enough detail to give you the information you need at a glance, with the option of following a link if you want to find out more. If you still can't find the information you need, you can email us at dataprotectionofficebg@curtisinst.com

The Privacy Notice applies to products and websites that refer to or link to the Privacy Notice (collectively, our "**Services**") and will apply whether you access our Services using a computer, mobile phone, tablet, TV, or other device.

Please click on the links below for further information on our privacy practices:

Section Quick Links:

Section	Page
1. Who are we?	2
2. What is Personal Information and what Personal Information does Curtis collect about you?	2
3. How is your Personal Information collected?	3
4. How do we use your information?	3
5. To whom do we disclose your information?	4
6. What do we do to keep your information secure?	5
7. Accessing your Personal Information and other rights you have	6
8. Data Retention – How long we will store/keep your Personal Information	6
9. Third-Party Links and Products on Our Services	7
10. Cookies	7
11. Your Choices (e.g. marketing related emails or otherwise)	7
12. Changes to this Privacy Notice	8
13. Contact Us / Further Information	8

1. Who are we?

Curtis is made up of different legal entities, details of which can be found here <http://www.curtisinstruments.com/contact/>. This privacy notice is issued on behalf of the Curtis group so when we mention "Curtis", "we", "us" or "our" in this Privacy Notice we are referring to the relevant company in the Curtis group responsible for processing your personal information. Curtis/Balkan Ltd. is the controller and responsible for this website.

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the Data Privacy Manger using the details set out below.

Contact details

Curtis/Balkan Ltd.

156, Tzar Boris III Boulevard

1618 Sofia

Bulgaria

dataprotectionofficebg@curtisinst.com

2. What is Personal Information and what Personal Information does Curtis collect about you?

For the purposes of this Privacy Notice "**Personal Information**" consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, photographs, location data, an online identifier (e.g. cookies identifiers and your IP address) or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. When we combine other information (i.e. information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

We may collect use, store and transfer different kinds of Personal Information about you which we have grouped together as follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes address, email address and telephone number.
- **Technical Data** includes internet protocol (IP) addresses, the type of browser used while visiting our website and the numbers of users who visit our website.
- **Usage Data** includes usage session dates and duration, page views, and how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

3. How is your Personal Information collected?

Curtis collects information when a user visits our website, when a customer contacts us whether by the telephone, email or post. We use different methods to collect data from and about you including:

- **Personal Information you provide directly.** You may give us your Identity, Contact and Marketing and Communications Data by filling in forms or by corresponding with us by email, phone or otherwise. This includes Personal Information you provide when you:
 - Purchase any of our services or products,
 - Voluntarily complete a Request for Information form; or
 - Otherwise interact with us.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this Personal Information by using cookies and other similar technologies. Please see section 10 below and our cookie policy for further details.

4. How do we use your information?

We may use the Personal Information we collect for the following purposes:

- **Deliver our Products** - as well as to administer systems and accounts;
- **Analysis Purposes** - for assessment and analysis of our market, customers, products, and other Services, and to create sales, marketing and promotional plans and programs;
- **Product Improvement** – to enhance our products and the user experience and to develop new products;
- **Customer Support Services** - to provide customer support services, product training and education to users;
- **Business Purposes** - for business monitoring and internal record keeping;
- **Legal Obligations** - to comply with our legal obligations;
- **Training** – for staff training and quality assurance purposes, particularly in relation to our customer support representatives; and
- **Updates** - to communicate with you, including communicating with you about your transactions with us, giving you important information about your products, sending you notices about any material changes to our Privacy Notice, and, where permitted by you and applicable laws, marketing, sending you offers and promotions for our products.

The law allows us to use the Personal Information as set out above on the basis that the processing is necessary for the performance of a contract with you, or we are acting in our "legitimate interests".

Marketing communications

Curtis may use your Personal Information to provide you with email notifications and other communications by email and post [, telephone, and/or text message (SMS)], on the basis that such use is necessary for the purposes of the legitimate interests pursued by us. For further information on this, see the 'Your Choices' section of this Privacy Notice.

Combining Personal Information

We may combine the Personal Information that we collect from you (including information received from our affiliates) to the extent permitted by applicable law. [For example, we may combine various different databases that contain your Personal Information to allow us to provide better support services and more personalised content (such as, marketing).]

5. To whom do we disclose your information?

We will only use your Personal Information for our internal business purposes, some of which are mentioned above. We do not sell any of your Personal Information to third parties. However, we may disclose your information to the following entities:

- **Curtis Affiliates**

We may need to transfer your Personal Information to other Curtis affiliates to provide the products you require or any other services/assistance you request. All Curtis affiliates are required to follow the privacy practices set forth in this Privacy Notice, or such other privacy notice that they may notify to you.

- **Service Providers**

We use third party service providers to help us to administer certain activities and services on our behalf, such as analysing usage of our Services, storing information on our database management system. We may share Personal Information about you with such third party service providers solely for the purpose of enabling them to perform services on our behalf and they will operate only in accordance with our instructions. Here are examples of third-party service providers we use:

- a. *Analytics Service Providers* – analytics providers are used to assist us in understanding the usage of our products/devices and other Services, to enable us to improve our Services. The analytics provider we currently use is Google Analytics. [For further information see our Cookie Policy.]
- b. *Database management system* – we use Microsoft Access and Syteline CRM to store and analyse our data.

- **Third parties when required by Law or to Protect our Services**

We will disclose your Personal Information to comply with applicable law or respond to valid legal process, including from our regulators, law enforcement or other government agencies; to protect our customers (e.g. to prevent spam or attempts to defraud users of our products); to operate and maintain the security of our products (e.g. to prevent or stop an attack on our systems or networks); or to protect the rights or property of Curtis, including enforcing any terms or agreements governing the use of our products.

6. What do we do to keep your information secure?

We have put in place appropriate physical and technical measures to safeguard the Personal Information we collect in connection with our products. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality. However, please note that although we take appropriate steps to protect your Personal Information, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

International Transfer of Data

The Personal Information that we collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic Area ("**EEA**"), including but not limited to the United States of America or in any other country where Curtis or Curtis' subsidiaries or service providers maintain facilities.

By using or participating in any Service and/or providing us with your Personal Information, you acknowledge that we will collect, transfer, store and process your information outside of the EEA. We will take all steps reasonably necessary to ensure that your Personal Information is kept secure and treated in accordance with this Privacy Notice and the requirements of applicable law wherever the data is located. Where we transfer your Personal Information outside the EEA to other members of the Curtis group, we use the EU Model Clauses to ensure the recipient provides an adequate level of protection to your Personal Information.

Where we transfer your Personal Information outside the EEA to other third parties, we will ensure that appropriate transfer agreements and mechanisms are in place to help ensure that our third party service providers provide an adequate level of protection to your Personal Information. We will only transfer your Personal Information outside the EEA in accordance with applicable laws or where you have given us your consent to do so.

7. Accessing your Personal Information and other rights you have

Curtis will collect, store and process your Personal Information in accordance with your rights under any applicable data protection laws. Under certain circumstances, you have the following rights in relation to your Personal Information:

- **Subject Access** - you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.
- **Right to Withdraw Consent** – where you have consented to our processing of your Personal Information, you have the right to withdraw such consent *at any time*. In the event you wish to withdraw your consent to processing, please contact us using the details provided in [Section 13](#).
- **Data Portability** – you may, in certain circumstances, request us to port (i.e. transmit) your Personal Information directly to another organisation.
- **Rectification** – we want to ensure that the Personal Information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, we will rectify or update any incorrect or inaccurate Personal Information about you.
- **Erasure ('right to be forgotten')** - you have the right to have your Personal Information 'erased' in certain specified situations.
- **Restriction of processing** – you have the right in certain specified situations to require us to stop processing your Personal Information and to only store such Personal Information.
- **Object to processing** – You have the right to object to specific types of processing of your Personal Information, such as, where we are processing your Personal Information for the purposes of direct marketing.
- **Prevent automated decision-taking** – in certain circumstances, you have the right not to be subject to decision being taken solely on the basis of automated processing.

Enforcing your rights

If you wish to enforce any of your rights under applicable data protection laws, then please contact us at dataprotectionofficebg@curtisinst.com We will respond to your request without undue delay and by no later than one month from receipt of any such request, unless a longer period is permitted by applicable data protection laws, and we may charge a reasonable fee for dealing with your request which we will notify to you. Please note that we will only charge a fee where we are permitted to do so by applicable data protection laws.

Complaints

If you are concerned that we have not complied with your legal rights under applicable data protection laws, you may contact the Commission for Personal Data Protection which is the data protection regulator in Bulgaria which is where Curtis/Balkan Ltd. is located. Alternatively, if you are based outside Bulgaria, you may contact your local data protection supervisory authority.

8. Data Retention – How long we will store/keep your Personal Information

Curtis retains Personal Information for as long as necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this Privacy Statement unless a longer retention period is required by law. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

For further details of our Document Retention Policy please contact the Data Protection Office at dataprotectionofficebg@curtisinst.com

9. Third-Party Links and Products on Our Services

Our websites, applications and products may contain links to other third party websites that are not operated by Curtis, and our websites may contain applications that you can download from third parties. These linked sites and applications are not under Curtis' control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third party websites or applications, any Personal Information collected by the third party's website or application will be controlled by the Privacy Notice of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Information.

10. Cookies

What are cookies?

Curtis may use cookies on our website. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. Cookies are assigned to and stored in a user's internet browser on a temporary (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, product usage and content viewed which allows for Curtis to provide users an enhanced and customized experience when engaging with our website.

Further information on cookies

We use session ID cookies on Curtis websites to make the user experience easier. A cookie is a small text file that is stored on a user's computer for record-keeping purposes, but we do not link the information we store in cookies to any personally identifiable information you submit while on our site.

Customers and prospects are able to set their own user-controllable cookie preferences on their own web browser, including the option not to receive cookies. Opting out of cookies will not adversely affect anyone's ability to view Curtis websites.

11. Your Choices (e.g. marketing related emails or otherwise)

When you purchase our products, voluntarily complete a Request for Information form on our website, or otherwise communicate with us, we and other Curtis affiliates may use your Personal Information such as your contact details (e.g. name, address, email address, telephone number) to send you, marketing-related correspondence by email and post, telephone and/or text message (SMS) related to our products. When we process your Personal Information for marketing purposes, we do so on the basis that it is in our legitimate interests to do so.

We do not share Personal Information with third parties for the third parties' marketing purposes.

We may also use your Personal Information to personalise and to target more effectively our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you.

To opt out of receiving marketing-related correspondence from Curtis, please click "Unsubscribe" from any marketing or promotional email or text message (SMS) you receive from us.

12. Changes to this Privacy Notice

It also is important that you check back often for updates to the Privacy Notice, as we may change this Privacy Notice from time to time. The “Date last updated” legend at the bottom of this page states when the notice was last updated and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by email or by posting notice of the changes on the Curtis website or through any relevant Services.

13. Contact Us / Further Information

If you have any questions regarding the collection, processing, or use of your Personal Information or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Privacy Notice or delete any of your Personal Information, please contact us:

By mail:

Data Protection Office

Curtis/Balkan Ltd.

156, Tzar Boris III Boulevard

1618 Sofia

Bulgaria

By email:

dataprotectionofficebg@curtisinst.com