HAMAMATSU
PHOTON IS OUR BUSINESS

HAMAMATSU PHOTONICS UK LIMITED

DATA PRIVACY STATEMENT

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Data Privacy Statement

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1. Introduction

This privacy notice explains how Hamamatsu Photonics UK Limited. (“we”, “HPUK”, “us” or “our”) handle any personal information about you. HPUK is a limited company that distributes products developed and manufactured by Hamamatsu Photonics K.K. and its affiliated companies (“Hamamatsu”, “HP”,), registered in England, Company 2228744. Details on how to contact us are in Section 6 below.

HPUK is committed to protecting your personal information and being transparent about what information we hold, whether you are a client, supplier, employee, candidate, trainee or you connect to us in another way.

The purpose of this policy is to give you a clear explanation about how HP collects and uses the personal information you provide to us, whether online, via phone, email, in letters, in any other correspondence or from third parties.

We ensure that we use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains in accordance with GDPR law (General Data Protection Regulation, European Union directive 2016/679):

- When, why and what personal information HP may collect about you
- How we might use that information
- Our legal basis for contacting you and using your personal information
- The means we use to protect your personal data, where it is stored and, eventually shared,
- Your rights and choices regarding personal information you provide to us

2. When do we collect personal information?

We may collect personal information about you when you:

- Ask about our activities, resources or services,
- Register with us for information,
- Register to technical events (as FDSS user meetings, Technology Days),
- Use our services or attend our activities,
- Sign-up for publications or newsletters,
- Purchase resources from us including through our website,
- Telephone, write, contact us online, text us, or otherwise provide us with your personal information,
- Apply for a job with us as part of our recruitment process,
- Become an employee of HP.

We may collect information about you directly whenever you interact with us.
We may also receive information about you when you interact with third parties with whom we work.

We may supplement what we know about you with information that is available in the public domain. For example, in order to ensure that our communication with you is relevant and tailored to you.

3. Why do we collect this information?

The main purposes for which we use your personal information are:

- To enable us to carry out the work of HP as specified in our Business activities,

- Promoting the interests of HP,
- Creating materials for stakeholders about HP's activities;
- For legal and regulatory compliance purposes, for example, to ensure compliance with safeguarding, health and safety requirements and other legal obligations, or in connection with litigation, an internal investigation or audit, and to ensure compliance with laws, as well as equal opportunities monitoring;
- To manage our employees;
- To maintain our own accounts and records;
- To inform individuals of news, events, activities or services running at HP and partner organizations;
- For administrative purposes, (for example employee medical examination, fleet management, retirement planning);
- To carry out any contractual obligations we may have with you such as fulfilment of an order through our online shop;
- For internal record keeping relating to any ideas, comments, feedback, or complaints;
- To contact you where you have been identified as a contact person for an organization with whom we do or may work (if we obtain your contact details in this way, we will only use them to contact you in your capacity as a representative of that organization);
- For our 'legitimate business interests', which means reasonable use in line with the aims and activities of HP.

4. What information do we collect?

Personal information we collect can include such information as your name, communication preferences, email address, postal address, telephone number, mobile number, date of birth, and, where relevant, bank account details so we can process payments and information as to whether you are a taxpayer or for the purposes of paying employees.

We may also collect and record any other relevant information you share with us about yourself, for example your employer if you are a trainee, or if you contribute to one of our affiliate activities.

We may also collect and process information about your interactions with us, including details about our contacts with you for example through email on the phone or in person (such as the date, time, and method of contact), details about events or activities that you register for or attend and any other support you provide to us.

Under data protection law, certain categories of personal information are recognized as sensitive, including information regarding race, religious beliefs sexuality, gender, health information, whether you are looked after through the local authority ('in care'), or other characteristics relevant to the purpose for which we hold your data e.g. safeguarding. In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate facilities or in some countries about reasons of your sickness, for instance, should this require us to adapt your office working environment.

We will only collect sensitive personal data with your consent, and clear notices will be provided on applications for events and other relevant forms and communications, so you know what information we need and why we need it.

We keep your personal information only for as long as required to carry out the functions of HP in accordance with legal requirements, as well as tax and accounting rules. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

5. Consent process

Generally, our processing of your personal information as described in this policy is allowed by applicable data privacy laws because we have a legitimate need to carry out the processing for the purposes described above.

Some processing may also be necessary so that we can perform a contract with you (e.g. if you order items from our sales team) or because it is required by law. We only use your information to send you marketing communications by email or text with your consent, and you can always opt out of receipt of marketing communications by post or telephone as explained below.

When you sign up to a newsletter or opt-in to our communications using our forms (e.g. a registration form, or online form) or in person, then you are giving us your consent to send you information and, marketing materials by the methods you have chosen, (e.g. email or phone call). We will never send you marketing information by email or SMS without your consent, and you can withdraw your consent at any time.

We will always take care when contacting those who access our services to ensure that we do not 'out' someone to third parties or leave you at risk of being outed.

If you have provided us with your postal or telephone contact details, but haven't specifically opted-in to receive our communications (for example, making a specific request by post), then we will carry out an assessment of whether it would be fair and reasonable to use them to send marketing information to you without your explicit consent. This is called a "legitimate interests assessment".

In all cases, we balance our legitimate interests against your rights as an individual, and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Privacy Statement, and that does not intrude on your privacy or previously expressed marketing preferences.

You can opt-out of our marketing and newsletter communications at any time (e.g. through clicking on 'unsubscribe' when you receive our online bulletin or by contacting info.gdpr@hamamatsu.co.uk.

You can opt-out of your data being used for profiling and wealth screening techniques by contacting info.gdpr@hamamatsu.co.uk.

6. Your rights and choices

This section gives more detail about the following rights related to your personal information in compliance with GDPR official requirements:

- The right to request that inaccuracies be corrected
- The right to request a copy of personal information held about you
- The right to request us to stop processing your personal data
- The right to withdraw consent
- The right to lodge a complaint with us
- The right to not undergo assessment decisions, that effects on individuals through automatic processing such as profiling.

You can help us keep our records up-to-date by telling us when your contact details or other personal information changes. You can also change your mind at any time about how we contact you or ask us to stop contacting you altogether.

Where you have provided your consent for our use of your personal information, you have a right to withdraw your consent at any time.

Please contact us on info.gdpr@hamamatsu.com to request this or at the postal address below.

It is important to be aware that some information you have given us will be in the public domain if you have consented to this, e.g. if you participate in a promotional activity, filming or if you feature in our marketing materials. This may mean that it may not be possible to withdraw this material from circulation, so please think carefully about the consequences of consenting to your information being used in this way, before signing any release forms with us.

You have a right to request a copy of the personal information we hold about you, and to have any inaccuracies corrected.

You also have the right to request us to erase your personal information, request us to restrict our processing of your personal information or to object to our processing of your personal information.

We will comply with our legal obligations in relation to such requests, but please be aware that some information may need to be retained by us for legal reasons, for example if there is ongoing litigation or a reasonable prospect of law enforcement action.

Should you wish to exercise the above rights, please provide as much information as possible about the nature of your contact with us, to help us locate your records, including 'nicknames'/aliases that you might have been known by, and details of in what ways you have had contact with us. We may request confirmation of your identity before we release the information if we reasonably believe this is necessary to safeguard the personal information.

Please address requests to:

Hamamatsu Photonics UK Limited
2 Howard Court, 10 Tewin Road
Welwyn Garden City
Hertfordshire, AL7 1BW

Or to: info.gdpr@hamamatsu.co.uk

If you have concerns about the way in which we have handled your personal information, we ask that you contact us in the first instance by post or email (to the addresses above). If you are still dissatisfied, you have the right to complain to the Data Protection Authority Regulation, Information Commissioner's Office www.ico.org.uk which oversees the protection of personal data in the respective European countries.

7. How do we protect your personal information?

We take appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary.

Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure.

We do our best to protect personal information, but we cannot guarantee the security of the network or systems which you use for transmission of the personal data to us, so any transmission is at the user's own risk.

8. Sharing your personal information

We promise to make all reasonable efforts to keep your details secure.

We will only share them with suppliers or professionals working on our behalf, or on a need to know basis for legal reasons e.g. safeguarding concerns. We carefully select suppliers and professionals and will only share information with them if we are confident that they will protect it.

And if the supplier or professional are located outside EEA countries which may have not been determined to be adequacy on data protection from the European Commission, we will take appropriate security measures under an agreement which satisfies EU requirements for the transfer of personal data to data processors or data controllers outside the EEA, such as Standard Contractual Clauses (SCC) or appropriate Data Protection Agreement (DPA) in place with them that assures this.

We will only ever share your details with other organizations to use for their own purposes if:

- We are required to by law or by a regulator;
- We deem it necessary and appropriate to respond to a legitimate request of assistance from law enforcement agencies;
- We are seeking legal or financial advice to investigate, prevent, or take measures against illegal acts or suspicious acts;
- Where appropriate, to enforce the rights of HP and its employees.

Employees are informed at the time of hiring that certain teams within Hamamatsu Photonics Europe are organised on a cross-border, Europe-wide basis. Employees are further informed that, where they participate in such cross-border or group-wide teams or functions, a limited exchange of employee personal data between participating subsidiaries may take place for organisational and management purposes. The provision of this information is ensured by the responsible Data Protection Manager (DPM) or Data Protection Coordinator (DPC) of the employing subsidiary.

We will not, under any circumstances, share or sell your personal information to any third party for marketing purposes, and you will not receive offers from other companies or organizations as a result of giving your details to us.

Where you have given consent to do so, we may disclose your personal information:

- to any stakeholders, other participants as described in this release;
- to the general public where we use materials for promotional purposes.

9. Where personal information is stored

Your personal information may be transferred to, and stored at, a destination outside EEA countries which may have not been determined to be adequacy on data protection from the European Commission. In these cases, we will take appropriate steps to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely. You can contact us for information of the applicable safeguards.

We store our data in line with our Global Data Privacy Policy designed internally and implemented into our HP teams, using secure physical safeguards (e.g. in locked filing cabinets in lockable offices) and secure IT systems, (e.g. password protected computers and systems, 256b encrypted data transfers, etc).

10. Changes to this privacy policy

We may update the terms of this policy at any time, so please do check it from time-to-time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us, by placing a prominent notice on our website, and through arrangements in our face-to-face services.

By continuing to use our website or services, you will be deemed to have accepted such changes.