



PRIVACY POLICY – MAY 2018

What Personal Data is collected?

PaneLess Glass collects and processes contact information about you or your company for the purpose of having a sales relationship or potential sales relationship with you or your company. In that connection, as your company's contact person, PaneLess Glass also collects and processes personal data about you which can include the following personal data: contact ID, first and last name, job title, academic title, title, email, correspondence language, and survey responses, if any, (hereinafter the "Personal Data").

The Purpose of collecting the Personal Data

PaneLess Glass processes the Personal Data to be able to provide you and your company the best service and experience as a PaneLess Glass customer or a potential PaneLess Glass customer. This includes processing of your Personal Data to be able to fulfil the contract with your company in relation to PaneLess Glass' identification and initiation/offer/quotation processes as well as in the negotiation, order fulfilment and after sales processes. We may also give you the opportunity to participate in customer satisfaction surveys.

Further, PaneLess Glass uses your Personal Data to make reports regarding activities, quotations and opportunities to be able to provide customers with the best service, to support account management and sales/activity planning in the sales processes.

Besides the above, all email interactions with customers, including correspondence with you, are being logged in PaneLess Glass' email system, either outlook or gmail to enable PaneLess Glass to follow up on the customer relation and document the agreements that have been entered into with a customer.

The legal basis for collecting the Personal Data

The processing of your Personal Data is based on the understanding between you and a PaneLess Glass employee that you are or may be interested in purchasing PaneLess Glass products. The processing of your Personal Data is thereby considered necessary for the performance of a contract to which you are a party or to take steps at the request of you prior to entering into a contract, cf. art. 6(1), lit. b of the General Data Protection Regulation (EU) 2016/679 ("GDPR").

Your Personal Data may only be processed for different purposes if this is necessary in order to comply with legal or regulatory obligations (e.g. transfer to courts or criminal prosecution authorities), if you have consented to the respective processing, or if the processing is otherwise lawful under applicable law. If processing for a different purpose takes place we may provide you with additional information.

Details of the data controller and recipients of the Personal Data

PaneLess Glass South East, Stonydene, Rucklers Lane, Kings Langley, Hertfordshire, WD4 9ND, +447401992813 or PaneLess Glass South West, Willow Barn, Whitnage, Tiverton, Devon, EX16 7DT, +447729392230 (jointly referred to as "PaneLess Glass") are joint data controllers and responsible for data security and the processing of your Personal Data according to the specific purposes mentioned above.

PaneLess Glass can share your Personal Data with third parties acting as PaneLess Glass' data processors for processing your Personal Data according to the purposes mentioned above. The following data processors are used:

- Wix.com Inc., 500 Terry A. Francois Boulevard, 6th Floor, San Francisco, CA, 94158.
- Microsoft Ireland Operations Limited, Atrium Building Block B, Carmenhall Road, Sandyford Industrial Estate, Dublin 18, Ireland: Microsoft assists PaneLess Glass in the processing of customer data and helps PaneLess Glass with the storing of data in the Microsoft Azure Cloud in Ireland.
- Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
- Adobe Systems Software Ireland Limited 4-6 Riverwalk, City West Business Campus, Dublin 24 Ireland: Your Personal Data is replicated into Adobe Campaign and used either for marketing purposes if you have consented to this, or for other correspondence.
- Other local companies within the PaneLess Glass Group that will assist with IT support for the above systems and support for the sales processes.

Other authorised third parties may need to access or store Personal Data if required or permitted by applicable law (e.g. governmental authorities, courts, external advisers and similar third parties that are public bodies).

Each of these parties have their own privacy policy for review if required.

Retention period

PaneLess Glass will only store your Personal Data as long as necessary to fulfil the above-mentioned purposes, namely as long as you are in a business relationship with PaneLess Glass customer. Some of your Personal Data may be stored for a longer period in an anonymised form that does not allow you to be identified.

Some of your Personal Data may, however, be stored for accounting purposes or for defence of legal claims. This Personal Data will be stored until the expiration of the statutory limitation period. Moreover, some of your Personal Data may be stored in an anonymised form that does not allow you to be identified.

How can you access your Personal Data?/Further rights

Under applicable law, you have various rights (under the conditions set out in applicable law).

Right of access: You may have the right to obtain from us confirmation as to whether or not Personal Data concerning you is processed, and, where that is the case, to request access to the Personal Data. The access information includes – inter alia – the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You may have the right to obtain a copy of the Personal Data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

Right to rectification: You may have the right to obtain from us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

Right to erasure ("right to be forgotten"): Under certain circumstances, you may have the right to obtain from us the erasure of Personal Data concerning you and we may be obliged to erase such Personal Data.

Right to restriction of processing: Under certain circumstances, you may have the right to obtain from us restriction of processing your Personal Data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

Right to object: Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, or where Personal Data are processed for direct marketing purposes at any time to the processing of your Personal Data by us and we can be required to no longer process your Personal Data.

Right to data portability: Under certain circumstances, you may have the right to receive the Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.

If you would like to know more or wish to use one or more of your above rights, you are welcome to contact PaneLess Glass at pane-less-glass@live.com

Filing of complaints

In case of complaints, you also have the right to lodge a complaint regarding the processing of your Personal Data by contacting pane-less-glass@live.com

Changes to the Privacy Notice

We reserve the right to change or supplement this Privacy Notice at any time. To the extent the changes to the Privacy Notice are regarded as material and significant, you will be informed hereof, for example via email or on PaneLess Glass' company website.