

## WORK INSTRUCTION

### Privacy Notice

<b>System/ Process owner Approver:</b>	D. Millard
<b>Management Approver:</b>	C. Berry
<b>Quality Approver:</b>	D. Millard
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## 1. Scope

This Privacy Notice, together with any other applicable terms and conditions and referenced documents, explains how Scintacor Limited collects, uses, stores, and protects personal data. Personal data ("Personal Data") means any information directly or indirectly relating to an identified or identifiable living person. Personal data means any information relating to an identified or identifiable living individual, whether directly or indirectly

Scintacor Limited is committed to processing personal data fairly, lawfully, and transparently. Personal data will only be collected where it is necessary, relevant, and proportionate to our business activities. Data will be retained only for as long as required for the purpose for which it was collected or to meet legal obligations.

This Privacy Notice explains: (1) who we are (2) the personal data we collect (3) how we use the personal data (4) how and where personal data is stored (5) the lawful basis on which we process personal data.

## 2. Scintacor

For the purposes of UK and EU General Data Protection Regulation (GDPR), the Data Controller is:

**Scintacor Limited**

**Company Registration Number: 01773459**

**Registered Office: 125 Cowley Road, Cambridge, CB4 0DL**

References to "Scintacor", "the Company", "we", "us", or "our" mean Scintacor Limited. References to "you" or "your" mean users of our website, customers, suppliers, and other business contacts.

This Privacy Notice applies to personal data collected through our website (<https://www.scintacor.com>), business dealings, marketing activities, and contractual relationships.

## 3. Information Scintacor Collects

The majority of personal data processed by Scintacor relates to business contacts and contractual relationships. We may also process limited personal data relating to prospective customers and contacts, obtained from publicly available sources or third-party providers.

The types of personal data we may collect include:

- Name
- Job title
- Business or personal email address
- Business or personal telephone or mobile number
- IP address

## 4. How Scintacor Uses your Information

We use your personal information to provide you with quotes for our products. We may from time to time keep in touch with our contact base with targeted information-based emails. We retain information regarding customers and suppliers as part of our audit activities. We are aware that customers, suppliers and contacts will also be accessing our website and that by accessing the Site, you agree to the collection and use of information in accordance with this Policy.

We process personal data for the following purposes:

- To provide quotations and respond to enquiries
- To perform and manage contracts entered into with customers and suppliers
- To issue invoices and manage payments

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- To maintain records for audit and regulatory purposes
- To communicate business updates and relevant information
- To improve the quality and performance of our website and services

Aggregated and anonymised data may be used for analytical and quality improvement purposes.

By accessing our website, you acknowledge that information may be collected and processed in accordance with this Privacy Notice.

## 5. Where Scintacor Stores Your Personal Data

Electronic data is stored on secure servers protected by industry-standard security controls, including firewalls and password protection.

Paper records are stored in secure on-site locations or the secure archive.

Access to personal data is restricted to authorised employees, contractors, or agents with a legitimate business need.

Appropriate technical and organisational measures are in place to protect personal data against unauthorised access, loss, destruction, or disclosure.

While we take all reasonable steps to safeguard personal data, transmission over the internet cannot be guaranteed to be completely secure.

All personnel with access to personal data are subject to confidentiality obligations and disciplinary procedures where those obligations are breached.

## 6. Lawful basis of Processing

We process personal data on one or more of the following lawful bases:

- Performance of a contract – where processing is necessary to fulfil contractual obligations or to take steps prior to entering a contract
- Legal obligation – where required to comply with applicable laws
- Legitimate interests – including maintaining business relationships and communicating relevant information
- Consent – where required, such as for marketing communications or cookies

Where legitimate interests are relied upon, these interests have been balanced against the rights and freedoms of the data subject and do not conclude this is unreasonable, as at all times the data subject has a right to be forgotten and their personal details to be deleted.

## 7. Retention Periods

### 7.1. Customers

We need to keep your personal data to allow us to ensure compliance with the contract in terms of your orders of our products. We keep a record of these orders after the contract to ensure compliance with that contract. We may keep limited personal data of customers to include contact details and transactional history, as we have a legitimate business interest to keep such records, as many of our customers return to us several years later for products and this assists our business to ensure that our customers are provided with the best possible service.

## 7.2. Suppliers

Supplier personal data is retained to manage contractual obligations and compliance, and may be held beyond the contract term where there is a legitimate business or legal requirement.

Retention periods for customers and suppliers are defined within the table below and vary by department and data type

Department	Type of Customer or Supplier Data Retained	Date	Reason
HR	Business cards	6 years	Performance of the contract
Finance	Annual audit report Credit checks on companies	2 years	Legitimate interest
QHS	QA audit documents and QA tracker End of year reports for QA and H&S Risk and opportunities registers Customer audits, emails, reports, agendas Regulatory audits, emails, reports, agendas Business Continuity Plan and test records Communications list GDPR register	15 years	Legal obligation Legitimate interest Performance of the contract
	Health surveillance data held by Scintacor Supplier H&S Risk Assessments and environmental reports H&S checklists and trackers	40 years	Legal obligation
	3 <sup>rd</sup> part supplier contracts	6 years	Performance of the contract
	QA and H&S audit emails	Until report fully signed	Legitimate interest
Shipping	Courier details and systems CofC's and Delivery Notes etc., Export licenses Accounts with couriers and account managers, performance reports Delivery notes inbound CofC inbound	15 years	Legitimate interest Performance of the contract
Supply chain	Supplier database - Addresses and contact details New Supplier forms	15 years	Performance of the contract
	Sub-contractor contracts Courier invoice data MSS data for HMRC SAD (Single Administrative Document) - All couriers	6 years	Performance of the contract Legal obligation
	Raised PO's	18 months	Performance of the contract
	Factory master database	15 years	Performance of the contract
Facilities	Supplier Reports Shire system	15 years	Performance of the contract

	Service contracts		
	Customer RAMS Scintacor Method Statements	40 years	Legal obligation
IT	Previous employee SharePoint one drive data archive	6 years	Performance of the contract
	General employee email access	6 months	Performance of the contract
	Si Pass	12 months	Legitimate interest
	CCTV	6 months	Legitimate interest
Sales	NC log and forms Salesforce Information Datasheet download information Contact Us (leading to contract) Purchase Orders NDAs	15 years	Performance of the contract Consent Legal obligation

### 7.3. Recruitment

Personal data submitted as part of recruitment activities will be retained for up to **six months** for unsuccessful candidates, unless consent is given for longer retention

## 8. Use of Cookies

The Scintacor website uses cookies. Cookies are small files that are placed on your computer by your browser which allow us to remember you each time you visit. Cookies contain no personal details about you and they can be disabled by changing your browser preferences.

The Scintacor website uses the following cookies:

- Strictly necessary cookies, for basic site operation and the cookie consent tool
- Analytics cookies, for understanding how the site is used, for example Google Analytics
- Behavioural analytics cookies, via Hotjar, to understand interaction patterns such as scrolling and clicks
- Marketing cookies, for Google Ads performance tracking

On the Scintacor website, analytics, behavioural analytics, and marketing cookies all require consent. Strictly necessary cookies do not. Consent is requested via the cookie banner. Analytics, Hotjar, and marketing cookies are blocked by default and only load after a user actively consents.

The cookie banner includes a detailed cookie declaration listing cookie names, providers, expiry periods, and descriptions. Users can view and manage this at any time and each cookie category explains its purpose.

Cookie data is processed by third party providers acting as data processors, mainly Google and Hotjar. Data is not shared with other Tibidabo group companies via cookies.

Cookie data is processed by third-party providers acting as data processors. No biometric data is collected.

## 9. Your Rights

You have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion of personal data
- Object to or restrict processing
- Withdraw consent at any time

Requests should be submitted to [info@scintacor.com](mailto:info@scintacor.com). Identity verification may be required and where requests cannot be fulfilled due to legal obligations, an explanation will be provided.

## 10. When Scintacor Shares Your Information

Scintacor does not sell, rent or trade personal data.

We may need to disclose your personal data to certain third parties (including solicitors, accountants and relevant business partners we work with), without obtaining your prior consent, in order to comply with our legal obligations and as required to do so by law.

### 10.1. International Transfers of Data

Personal data is not routinely transferred outside the European Economic Area (EEA). Where transfers are necessary, appropriate safeguards will be implemented in accordance with GDPR.

### 10.2. Third Party Websites

Our website may contain links to external websites. Scintacor Limited is not responsible for the privacy practices of third-party sites, and users should review their privacy notices separately

## 11. Consent

By submitting personal data to Scintacor Limited, you consent to its processing in accordance with this Privacy Notice. Where data is submitted on behalf of another individual, you confirm that you have appropriate authority to do so.

Consent may be withdrawn at any time by contacting [info@scintacor.com](mailto:info@scintacor.com), quoting this Privacy Notice in the email subject line, using the body of the email to say what consent you are revoking.

## 12. Changes to this Policy

This Privacy Notice is effective from 27 March 2026. Scintacor Limited reserves the right to update this Notice at any time.

Material changes will be communicated via email or a prominent notice on our website

If you have any questions about this Policy or the information we hold on you, please email: [info@Scintacor.com](mailto:info@Scintacor.com)