

## Privacy Policy

### Stelia Ltd

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to services we offer to individuals and our wider operations in the European Economic Area (EEA).

#### Key terms

We, us, our	Stelia Ltd (company no. 13779434) of 37 Commercial Road Commercial Road, Poole, Dorset, England, BH14 0HU
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic data Biometric data (where used for identification purposes) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

#### Personal data we collect about you

The personal data we collect about you depends on the particular services we provide to you. We may collect and use the following personal data about you:

- your name and contact information, including email address and telephone number and company details
- information to check and verify your identity, eg your date of birth
- your gender, if you choose to give this to us
- location data
- your billing information, transaction and payment card information
- your personal or professional interests
- your professional online presence, eg LinkedIn profile
- your contact history, purchase history and saved items
- information to enable us to undertake credit or other financial checks on you
- information about how you use our website, network, communication and other systems

We collect and use this personal data for the purposes described in the section 'How and why we use your personal data' below. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

#### How your personal data is collected

We collect most of this personal data directly from you — in person, by telephone, text or email and/or via our website and the Stelia Hub. However, we may also collect information:

- from publicly accessible sources, eg Companies House or HM Land Registry;
- directly from a third party, eg:
- sanctions screening providers;
- credit reference agencies;
- customer due diligence providers;
- from a third party with your consent, eg your bank
- from cookies on our website (for more information on our use of cookies, please see our cookie policy which is available on our website)
- via our IT systems, eg: through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

#### How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, ie to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other activities necessary to comply with legal and regulatory obligations that apply to our business, eg under health and safety law or rules issued by our professional regulator	Depending on the circumstances: — to comply with our legal and regulatory obligations — for our legitimate interests
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, ie to protect our business, interests and rights

What we use your personal data for	Our reasons
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests, ie to make sure we are following our own internal procedures
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: —for our legitimate interests, ie to protect trade secrets and other commercially valuable information; —to comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, eg in relation to our customer base, financial performance etc.	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	Depending on the circumstances: —for our legitimate interests, ie to prevent and detect criminal activity that could be damaging for you and/or us; —to comply with our legal and regulatory obligations
Protecting the security of systems and data used to provide our services	To comply with our legal and regulatory obligations We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Updating and enhancing customer records	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract; —to comply with our legal and regulatory obligations; —for our legitimate interests, eg making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	Depending on the circumstances: —to comply with our legal and regulatory obligations; —for our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: <ul style="list-style-type: none"> <li>— existing and former customers;</li> <li>— third parties who have previously expressed an interest in our services;</li> <li>— third parties with whom we have had no previous dealings.</li> </ul>	For our legitimate interests, ie to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests, ie to ensure our customers are likely to be able to pay for our services
External audits and quality checks, eg for ISO accreditation and the audit of our accounts to the extent not covered by 'activities necessary to comply with legal and regulatory obligations' above	Depending on the circumstances: <ul style="list-style-type: none"> <li>— for our legitimate interests, ie to maintain our accreditations so we can demonstrate we operate at the highest standards;</li> <li>— to comply with our legal and regulatory obligations</li> </ul>
To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: <ul style="list-style-type: none"> <li>— to comply with our legal and regulatory obligations;</li> <li>— in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets</li> </ul>

### How and why we use your personal data — in more detail

More details about how we use your personal data and why are set out in the table below.

Purpose	Processing operation	Lawful basis relied on under the UK GDPR and EU GDPR	Relevant categories of personal data
Communications with you not related to marketing, including about changes to our terms or policies or changes to the products or other important notices (other than those addressed above)	Addressing and sending communications to you as required by data protection laws, ie: <ul style="list-style-type: none"> <li>the UK GDPR or Data Protection Act 2018;</li> <li>the EU GDPR</li> </ul>	Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))	<ul style="list-style-type: none"> <li>your name, address and contact information, including email address and telephone number and company details;</li> <li>your account details (username)</li> </ul>
	Addressing and sending communications to you about changes to our terms or policies or changes to the products or other important notices	Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you	<ul style="list-style-type: none"> <li>your name, address and contact information, including email address and telephone number and company details</li> <li>your account details (username)</li> </ul>

### How and why we use your personal data — Special category personal data

We do not currently process special category personal data. However, should we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

### How and why we use your personal data — sharing

See 'Who we share your personal data with' for further information on the steps we will take to protect your personal data where we need to share it with others.

#### Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You do, however, have the right to opt out of receiving marketing communications at any time by:

- using the 'unsubscribe' link in emails or 'STOP' number in texts; or
- updating your marketing preferences on the Stelia Hub.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and will never sell it to other organisations for marketing purposes.

#### Who we share your personal data with

We routinely share personal data with:

- companies within the Stelia Ltd group;
- our overseas offices (please see our website for further information on our locations);
- third parties we use to help deliver our services to you, eg payment service providers, MailChimp;
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;
- credit reference agencies;
- our bank.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

#### Where your personal data is held

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal data with').

Some of these third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens (see below: 'Transferring your personal data out of the UK and EEA').

#### How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used.

If you no longer have an account with us or we are no longer providing services to you, we will usually delete or anonymise your account data after 2 years.

#### Transferring your personal data out of the UK and EEA

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

We may transfer your personal data to our employees, subcontractors and/or service providers located outside the UK in the US.

We may also transfer your personal data from the EEA to the UK.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an ‘adequacy regulation’) further to Article 45 of the UK GDPR. We rely on adequacy regulations for transfers to the US where the receiving party is certified under the UK Extension to the EU-US Data Privacy Framework. Where the receiving organisation in the US is not certified, additional safeguards are put in place (see below);
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an ‘adequacy decision’) further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#);
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK or EEA, we do so on the basis of an adequacy regulation or (where this is not available) legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR and/or EU GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK/EEA unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on ‘Changes to this privacy notice’ below.

#### Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data (in certain situations)
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party (in certain situations)
To object	The right to object: <ul style="list-style-type: none"> <li>• at any time to your personal data being processed for direct marketing (including profiling);</li> <li>• in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims</li> </ul>
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consent	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time You may withdraw consent by choosing the relevant options within the Stelia Hub. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

For more information on each of those rights, including the circumstances in which they apply, please contact us (see ‘How to contact us’ below) or see the [Guidance from the UK Information Commissioner’s Office \(ICO\)](#).

If you would like to exercise any of those rights, please:

- email, call or write to us, see below: ‘How to contact us’; and
- provide enough information to identify yourself (eg your full name, address and customer reference number) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

#### Keeping your personal data secure

We have appropriate security measures to prevent personal data from being lost accidentally, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems and are working towards our ISO 27001 and SOC 2 certifications, which means we follow top industry standards for information security.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

#### How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below ‘How to contact us’). We hope we will be able to resolve any issues you may have. You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator) and/or the relevant supervisory authority in your jurisdiction. Please contact us if you would like further information.

For a list of EEA data protection supervisory authorities and their contact details see [here](#).

#### Changes to this privacy notice

This privacy notice was published and last updated on 18 January 2024.

We may change this privacy notice from time to time. When we do we will inform you via our website or on the Stelia Hub.

#### Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, eg your surname or address; see below '**How to contact us**'. You can also update your personal data yourself in the Stelia Customer Portal, Cora.

**How to contact us**

You can contact us by post or email if you have any questions about this privacy notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
Email us at: <a href="mailto:connect@stelia.io">connect@stelia.io</a>
Write to us at: Metal Box Factory, 30 Great Guildford Street, London, SE1 0HS

**Do you need extra help?**

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).