



Dear Valued Customer,

Thank you for your request for information from Automotion Components Ltd. We are proud of our company and the products and service we manufacture and sell. We have been in existence for over 25 years and employ 40 staff.

We receive many such requests for quality and other information. Often these requests are from customers that either have not purchased many parts from us for a while or from customers simply wanting an up-dated set of information from us.

We have put together a pack of information which should provide you with most (if not all) of the details you require about us as your supplier.

The pack contains details on:

- General company information
- Quality Policy and certificates (ISO 9001)
- Environmental Policy (including REACH and RoSH compliance)
- Health and Safety Policy
- Ethical Policies (conflict materials and anti-child slavery policy amongst others)
- Modern Slavery Act Statement
- Privacy Policy for Customers

If you are one of our major customers, wishing to place a significant order, or have a particular wish for more information then please do not hesitate to contact us via email [sales@automotioncomponents.co.uk](mailto:sales@automotioncomponents.co.uk).

As a company policy we cannot sign any customers' Terms & Conditions without passing them through for review by our solicitors (which is quite expensive) so we only do that for potential orders over £50,000.

We value your business and thank you for your enquiry.

Yours sincerely,

The Sales Team  
Automotion Components



## Company Details

Name	Automotion Components Ltd.
Address	Alexia House Littlemead Industrial Estate Cranleigh Surrey GU6 8NE Great Britain
Websites	<a href="http://www.automotioncomponents.co.uk">www.automotioncomponents.co.uk</a>
Telephone	+44 (0)1483 26 67 74
Fax	+44 (0)1483 26 67 75
Year Established	1970
Business Type	Manufacture and distributor of specialized mechanical parts.
Company Type	Limited company and SME
Activities at address	Sales, Purchasing, Accounts, Technical Support, Warehouse, Manufacturing and Assembly, Distribution
Holidays / Shutdowns	Christmas Week and UK Bank Holidays
Sales Contact No.	+44 (0)1483 26 67 74 or 0845 850 99 40
Sales Contact email	<a href="mailto:sales@automotioncomponents.co.uk">sales@automotioncomponents.co.uk</a>
Accounts Payable email	<a href="mailto:accounts@automotioncomponents.co.uk">accounts@automotioncomponents.co.uk</a>
Accounts Contact No.	+44 (0)1483 26 67 74 or 0845 850 99 40
Company Registration No.	2761902
Company VAT No.	GB566 9902 88



### Bank Account Details

#### For UK Sterling payments

Bank	Barclays Bank PLC Marble Arch Corporate Banking, London
Sort Code	20-03-79
Account No.	00577758
Swift Code	BARCGB22
IBAN Code	GB36 BUBK 2003 790057 7758

#### For Euro payments

Bank	Barclays Bank PLC Marble Arch Corporate Banking, London
Sort Code	20-03-79
Account No.	87128377
Swift Code	BARCGB22
IBAN Code	GB84 BARC 2003 798712 8377

#### For US Dollar payments

Bank	Barclays Bank PLC Marble Arch Corporate Banking, London
Sort Code	20-03-79
Account No.	57034888
Swift Code	BARCGB22
IBAN Code	GB04 BARC 2003 7957034888

### Company Management

Sales	Lewis Sutton
Finance	Silke Ebling
Quality	Scott Kernahan

Signed: 

**Managing Director, April 2018**



## Automotion Components Quality Policy

**OUR GOAL AT AUTOMOTION COMPONENTS LTD ("AUTOMOTION") IS TO GIVE OUR CUSTOMERS TOTAL SATISFACTION BY MEETING THEIR NEEDS WITH FAST-RESPONSE, FRIENDLY SERVICE AND PRODUCTS MEETING THEIR QUALITY REQUIREMENTS SUPPLIED ON TIME AND AT A FAIR PRICE.**

Further, we must all think of everyone we serve - customers, suppliers, the person in the next department, and the person at the other end of the telephone - as "customers", and we must always give each of them a product, communication or service which is fit for their use. As part of our continual improvement, we will consider the impact of our service and prioritise our efforts to reduce adverse impacts caused by non-conformances to customers.

Automotion are committed to ensuring compliance with existing and future legislation, regulatory and other requirements to which the company subscribes whilst maintaining a programme of continual improvement through the framework of setting and reviewing objectives and targets so as to maintain and continually improve an effective Quality Management System in accordance with ISO 9001:2015. The policy is outlined the Quality Manual and it is the duty of all personnel to comply with it.

### **QUALITY IMPROVEMENT IS THE JOB OF EVERY EMPLOYEE**

The Quality Manual describes the Quality System in operation at Automotion. It explains the way in which the system operates and defines those employees responsible for the performance of quality related tasks within the company.

The quality system is the means by which the company supports its policy of providing to its customers a high quality product in accordance with all relevant standards and customer requirements and to provide these products on time.

The full detail of how this is to be achieved is covered by the annual preparation of a budget and plan. The implementation of this is cascaded throughout by means of an annual presentation to all employees and by the training and development interviews held with each employee. Regular management meetings review performance against the key objectives and these are then communicated to all employees at company monthly briefings.

The Directors are responsible for the implementation and operation of the quality system and are granted full authority to take whatever steps are necessary to ensure that the requirements of the quality system are followed.

Signed:

A handwritten signature in blue ink, appearing to be "A. J. P.", is written over a horizontal line.

**Managing Director, November 2017**

**Automotion Components ISO Certificate**

*Registration  
Certificate*

This is to certify that the Management Systems of

**Automotion Components Ltd**

have been assessed by AJA Registrars and registered  
against the requirements of

**ISO 9001:2015**

Certificate No. : **AJA06/9864**      Date of Original Registration : **23rd January 2006**  
Expiry Date : **30th October 2020**      Date of Re-Registration : **13th December 2017**  
Previous Expiry Date : **30th October 2017**



*Ramona Hinton*  
Chief Executive - AJA Registrars Ltd



This certificate is issued in respect of the locations & scope of registration detailed in the Associated Registrar Schedule.  
This certificate is the property of AJA Registrars Ltd Unit 6 Gordano Court Gordano Gate Business Park Stribert Close Portishead Bristol UK BS20 7TS  
and must be returned on request. A member of the AJA Group of Companies



Quality continued.

Automotion Components Ltd can confirm that ....

- We have a quality policy ✓
- We have a quality manual ✓
- We have communicated our policy to employees ✓
- Senior management review the quality system on a regular basis ✓
- Quality Objectives are established, communicated and monitored ✓
- The quality system has procedures which are made available to those that need them ✓
- Personnel who manage , perform and verify work have the authority to initiate actions to prevent non- conformance, identify and record problems or recommend and initiate solutions, control the processing or delivery of non- conforming product ✓
- We have procedures describing how contracts and orders are reviewed ✓
- We have document control procedure ✓
- We have a master list of controlled documents ✓
- We remove obsolete or invalid documents from work areas ✓
- We have a procedure to ensure purchased items conform to requirements ✓
- We have a procedure for the control of non- conforming product and non- conforming product is identified and segregated at all stages of the process ✓
- We have a procedure for implementing corrective and preventative actions ✓
- We retain records of corrective and preventative actions taken ✓
- We have an internal audit programme ✓
- We have a procedure to control the inspection and testing of products ✓
- We maintain records of inspection and test ✓
- Purchased product is verified against the requirement prior to use ✓
- Inspection and test status of products is readily apparent ✓
- We have procedures to control, calibrate and maintain test and measuring equipment ✓



## Automotion Components Environmental Policy

We at Automotion Components Ltd realise that:

Planned prevention or reduction of pollution is cheaper than rectifying after the event. It therefore makes sense to minimise waste and pollution to reduce long term costs, e.g. treat and recycle water rather than pay extraction and discharge costs.

Our policy begins with a consideration of the impact of the Company's activities on both the local and wider communities and will take account of transportation of raw materials, use of energy, distribution of finished product and discharge of emissions and wastes.

The Company therefore has the following commitments and objectives to:

- Minimise disturbance to the local and global environment and to the quality of life of the local communities;
- Comply with all relevant statutory regulation;
- Maintain appearances and highest environmental standards within the Company premises;
- Take positive steps to conserve scarce and non-renewable resources;
- Assess, in advance if possible, environmental effects of new processes and developments;
- Provide necessary information to enable proper use, storage and disposal of Company products to avoid harm to the environment;
- Provide necessary information to enable employees to operate processes properly and minimise effects on man and the environment;
- Keep the public informed of major new projects in the locality.

### OVERALL

- To develop the business paying full regard to the environment and taking into account the view of all parties whose interest may be affected.
- The Company will act in accordance with appropriate codes of practice.
- This policy will be communicated to all employees.

### ORGANISATION

- The Managing Director has ultimate responsibility for this policy through the Management team and will direct this policy to all concerned.

Signed:

A handwritten signature in blue ink, appearing to be "A. D. P.", written over a horizontal line.

Title: Managing Director

Date: November 2017

Automotion Components Ltd, Alexia House, Littlemead Ind Est, Cranleigh, Surrey, GU6 8NE  
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Environment continued.

Automotion Components Ltd can confirm that we monitor and seek to improve:

- Energy consumption ✓
- Water consumption ✓
- Waste production ✓
- Hazardous and toxic substance use ✓
- Transport ✓
- We have a system in place to monitor legislative compliance ✓
- We have the necessary authorisations to ensure business activities are meeting legislative requirements ✓
- We have a strategy to maximise recycling and minimise output of waste for disposal to landfill ✓
- We have had no environmental incidents in the last 3 years ✓
- We have received no warning notices or letters from the environmental regulator within the last 3 years ✓





## Automotion Components Health and Safety Policy

### GENERAL POLICY STATEMENT

Automotion Components Limited is committed to providing for the health, safety and welfare of all employees.

The company will observe the Health & Safety at Work Act (1974) and all relevant regulations and codes of practice.

Commitment to health and safety is a management responsibility and it is the duty of the Directors to ensure that this policy is upheld at all times and to provide the necessary funds and manpower required.

The company is responsible for:

- Assessing risk to the health and safety of employees and others and identifying measures needed to meet health and safety obligations
- Providing and maintaining equipment, protective clothing and systems of work that are safe and without risks to health
- Ensuring all necessary safety devices are installed and maintained on equipment
- Providing information, training and supervision in safe working methods
- Providing and maintaining a healthy and safe place of work
- Maintaining all portable electrical appliances within the company
- Promoting co-operation of employees to ensure safe and healthy systems of work
- Establishing an emergency procedure
- Monitoring and reviewing health and safety management including policy

All employees have a duty to co-operate with this policy and must

- Comply with any safety instructions and directions issued by the company
- Take reasonable care for their health and safety and the safety of others
- Co-operate to ensure that the aims of health and safety policy are achieved
- Report and co-operate in the investigation of all accidents
- Report any potential risk or malfunction of equipment to your line manager

This statement has been posted in a prominent place to ensure employees are familiar with our safety policy; it summarises the company's policy and is supported by a more comprehensive section in the Staff Handbook, risk assessments, and procedures.

Signed:  Title: Managing Director Date: November 2017



## Automotion Components RoHS and REACH Policies

### Restriction on Hazardous Substances (RoHS)

This document certifies that all components currently manufactured or sold by **Automotion Components Ltd.** contain no banned substances and are in compliance with Directive '2011/65/EU of the European Parliament and of the Council of 8 June 2011 (recast)' on the restriction of the use of certain hazardous substances in electrical and electronics equipment (RoHS Directives). This document also certifies that all material declarations provided by **Automotion Components Ltd.** are accurate to the best of our knowledge.

Specifically, **Automotion Components Ltd.** products do not contain:

- Asbestos
- Azo compounds
- Benzanthracene
- Cadmium and cadmium compounds
- Certain Shortchain Chlorinated Paraffins
- Chlorinated organic compounds
- Chrysene
- Dimethyl fumarate
- Dodecachloropentacyclo and dodecachloropentacyclo compounds
- Hexavalent chromium compounds (CR VI)
- Lead and lead compounds other than as exempted
- Mercury and mercury compounds
- Organic tin compounds
- Ozone Depleting Substances - Class I (CFCs, HBFCs, etc.)
- Ozone Depleting Substances - Class II (HCFCs)
- Perfluorooctane Sulphonate (PFOS)
- Phthalates (BBP, DBP, DEHP and DIBP)
- Polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE) including DecaBDE
- Polychlorinated Biphenyls (PCBs)
- Polychlorinated Naphthalenes (> 3 chlorine atoms)
- Radioactive Substances
- Reaction products of 1, 3, 4 thiadiazolidine-2,5-dithione, formaldehyde and 4-heptylphenol, branched and linear (RP-HP).
- Red Phosphorous
- Tributyl Tin (TBT) and Triphenyl Tin (TPT)
- Tributyl Tin Oxide (TBTO)

### Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)

**Automotion Components Ltd.** has evaluated the products offered by the company regarding their status under Registration, Evaluation, Authorization and restriction of Chemicals (REACH), the European Union regulation covering the use and importation of chemicals and substances into the European Economic Area (EEA). Section 2.1 of the ECHA guidance document (Requirements for Substances in Articles) defines an article as "an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition". So far as we know **Automotion Components Ltd.** products are considered articles under this definition and have been found not to contain Substances of Very High Concern (SVHC) as listed on the Candidate List of Substances of Very High Concern at concentrations above 0.1%(w/w). REACH regulations do not require **Automotion Components Ltd.** to register, notify or communicate substance information on products meeting these conditions that are offered in the EEA per section 4.2 of the ECHA guidance document. This statement covers all legitimate products offered in the official **Automotion Components Ltd.** catalogues or on the official websites.

Authorized signatory for **Automotion Components Ltd.**

**Anthony Iafrate** Managing Director, November 2017.

Automotion Components Ltd, Alexia House, Littlemead Ind Est, Cranleigh, Surrey, GU6 8NE

Tel: 01483 266774, Fax: 01483 266775, Email: [sales@automotioncomponents.co.uk](mailto:sales@automotioncomponents.co.uk), Web: [www.automotioncomponents.co.uk](http://www.automotioncomponents.co.uk)

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## Automotion Components Ethical Policies

### Anti-bribery policy

We do not tolerate bribery and corruption in any of its forms in our business. We comply with UK anti-bribery and corruption laws and regulations and support efforts to eliminate bribery and corruption worldwide. We work to make sure that our business partners share our commitment.

- We do not offer or accept bribes, kickbacks or any other kind of improper payment including facilitation payments.
- We keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes.
- We ensure all our staff are aware of the 2010 Bribery Act and comply with its principles.

### Commitment to human rights

We seek to conduct our business in a manner that respects the human rights and dignity of people. Each of us can play a role in the elimination of human rights abuses such as child labour, human trafficking and forced labour. Our staff are encouraged to report any human rights abuse in our operations or in those of our business partners.

### Anti-competitive conduct

We do not engage in any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers and/or restrict supply.

### Counterfeit products

We recognise that counterfeit components pose a serious threat to industry and its end customers. We provide genuine products to fulfil our customer expectations. When components cannot be obtained from traceable sources, we endeavour to use verified suppliers or take mitigation actions (e.g. testing) to minimize the risk of fraudulent components entering the supply chain. Our warehouse procedures include comprehensive inspection. We are able to provide full traceability on request.

### Conflict materials

We support the ending of violence and human rights violations in the mining of minerals from the area known as the "Conflict Region" in the east of the Democratic Republic of Congo (DRC) and surrounding countries. We have undertaken due diligence with our suppliers including the provision of written statements that none of the products we supply contain purchases of tin, tantalum, tungsten and gold from the "Conflict Region". We will not purchase products that contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.

Authorized signatory for **Automotion Components Ltd.** **Anthony Iafate** Managing Director, October 2017.



## Modern Slavery Act Statement Wixroyd

At Wixroyd we are committed to supporting human rights and we take seriously our responsibilities under the Modern Slavery Act 2015. We have a zero tolerance approach to slavery and human trafficking and are dedicated to understanding the risks so that we can work towards ensuring that there is no modern slavery in our business or supply chains.

### Structure of Wixroyd

Wixroyd is a leading manufacturer and supplier of specialist engineering components to industry and operates from Cranleigh in Surrey, UK. Along with our own manufacturing and assembly operations, we have a number of suppliers from the European Union, Central Europe, the USA and Asia. We employ approximately 50 staff at our site at Cranleigh and Tamworth in the UK.

### Our supply chains

The majority of our purchasing is of engineering components which we will use for manufacture of finished goods or warehouse and subsequently despatch. Our support suppliers provide items such as office supplies, IT support and systems, or professional services. We occasionally work with employment agencies who supply a limited number of people to work in our office or warehouse.

Procurement for engineering components is managed by a dedicated Purchasing team and support suppliers are managed by Finance and the management team. We pick our suppliers carefully and where appropriate carry out due diligence on these parties and endeavour to contractually require them to comply with applicable laws.

### Our anti-slavery initiatives and policies

We have reviewed our purchasing and employment practices and will continue to monitor and assess our practices in this area and encourage improvement. Our commitment to social responsibility is reflected in our employee training programmes and company policies - we expect the same high standards from our suppliers.

We encourage our employees to report any ethical concerns, and our Whistle-Blowing Policy is intended to make this simple for all colleagues who have concerns, with a clear reporting structure. We aim to ensure that appropriate protections are in place for any colleague who raises any concern, without fear of retaliation.

We implement 'right-to-work' checks on all new employees and monitor the hours worked by our colleagues. We also understand the importance of focusing on having a culture of engaging in all activities with respect and fair treatment of others.

We pay above the National Living Wage to all employees, not just those over 25.

### Due diligence processes for slavery and human trafficking

We have carried out an assessment to understand the areas of our business and supply chains where there is a risk of slavery and human trafficking taking place – which we have identified as a low risk. Our purchasing team assist in ensuring suppliers work with us to ensure we meet our legal obligations.

When taking on new suppliers in areas which we consider to be higher risk, we will undertake supplier due diligence and engage with potential suppliers to understand the actions taken by them to reduce the risk of slavery and human trafficking in their supply chains. We would treat any incident of modern slavery as a breach of our company policies, contractual terms and/or law.

We have focused on the assessment of our supply chain and high risk areas and on ensuring that we do not have any modern slavery in our own business; we aim to widen the supply chain assessment as detailed below.

### Further steps

This is our first Modern Slavery Act Statement and we recognise that this is an area which requires continual monitoring and improvement and we have plans in place to do this. Steps which we intend to take include:

- engagement with all suppliers to ensure they are complying with the Modern Slavery Act
- incorporating Modern Slavery Act compliance into our Staff Handbook
- incorporating a section on modern slavery into our whistleblowing policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking policy. This statement has been approved by Wixroyd's board of directors, who will review it annually.

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# **AUTOMOTION<sup>®</sup>**

## **COMPONENTS**

### **Privacy Policy for Customers**

Wixroyd International's privacy policy has been reviewed and developed to fully comply with the **General Data Protection Regulation (GDPR)** (Regulation (EU) 2016/679) and UK statute the Data Protection Act. GDPR is a regulation by which the European Parliament, the Council of the European Union, and the European Commission intend to strengthen and unify data protection for all individuals.

The directors of Wixroyd support the aim and objectives of this legislation and have in place a programme to meet its requirements.

This policy explains how we use any personal information we collect about you when you we transact with you and when you use our website.

#### **What information do we collect about you?**

We collect information about you when you register with us or place an order for products or services. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. Website usage information is collected using cookies. Specifically we will hold:

- Your name/company name
- Your address
- Your telephone number
- Job Title
- Detail of your products supplied, including catalogues and order numbers
- Specific delivery instructions

We will not retain information regarding your ethnicity, hobbies and interests or other 'special category' personal data.

#### **How will we use the information about you?**

We collect information about you to process your order, manage your account and, if you agree, to email you about other products and services we think may be of interest to you. We use your information collected from the website to personalise your repeat visits to our website. If you agree, we shall pass on your personal information to our group of companies so that they may offer you their products and services.

Wixroyd will not share your information for marketing purposes with companies outside the Group. In processing your order, we may send your details to, and also use information from credit reference agencies and fraud prevention agencies. In addition, we may provide your information and access to your information to the following companies to process orders, maintain our commercial systems and deliver your orders:

- \* Email process and despatch companies
- \* Our ERP provider and software houses
- \* Our professional printing contractor
- \* Couriers and freight forwarders

We select these vendors with care and require them to comply with GDPR legislation.

At present all the data that we collect from you is processed and stored in the EEA. We will take all reasonable steps to make sure that your data is treated securely and in agreement with this Privacy Policy.

Data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our site will be encrypted to ensure its safety.

The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.



## Marketing Access

We would like to send you information about products and services of ours and other companies in our group which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the Wixroyd Group. If you no longer wish to be contacted for marketing purposes, notify us in writing, or by email.

## Access to your information and correction

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the following address:

Customer Service Manager,  
Wixroyd International Limited,  
Alexia House,  
Little Mead Industrial Estate,  
Cranleigh,  
GU6 8NE.

*We may make a small charge for this service. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.*

## Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

## Other websites

Our website only contains links to websites of our group companies. This privacy policy applies to this website, but its principles apply to all group company websites.

## Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on our web site. This privacy policy 15<sup>th</sup> March 2018.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

By email: [info@wixroyd.com](mailto:info@wixroyd.com)  
By post to: Customer Service Manager,  
Wixroyd International Limited,  
Alexia House,  
Little Mead Industrial Estate,  
Cranleigh,  
GU6 8NE.

Signed by

A handwritten signature in blue ink, appearing to be "M.E.", is placed over the signature line.

Managing Director. March 2018



Protecting Your Privacy

Wixroyd Group

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### **1. Introduction**

The Wixroyd Group supplies products and services almost exclusively on a business-to-business contractual basis. Any personal information we collect relates only to an individual's role as an agent for their employer of business in fulfilling the business-to-business contract – we do not endeavour to collect any personal data other than to perform that contract.

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us, in your role as an agent for your employer or business. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how the Wixroyd Group uses your data.





It's likely that we'll need to update this Privacy Notice from time to time. You're welcome to come back and check it whenever you wish.

## 2. What is the Wixroyd Group?

The Wixroyd Group consists of the following related businesses:

- Wixroyd International Ltd – company registration number 00496138 registered in England
- Automotion Components Ltd – company registration number 2761902 registered in England
- Coburg Components Ltd - company registration number 1556243 registered in England
- Nylon and Alloys Ltd – company registration number 861056 registered in England

For simplicity throughout this notice, 'we', 'us' and "the Group" means the Wixroyd Group and its brands.

## 3. Explaining the legal bases we rely on

The Group supplies products and services almost exclusively on a business-to-business contractual basis. Any personal information we collect relates only to an individual's role as an agent for their employer of business in fulfilling the business-to-business contract – we do not endeavour to collect any personal data other than to perform that contract.

The law on data protection sets out a number of different reasons for which a company may collect and process personal data, including:

### Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you order an item from us for delivery, we'll collect your address details to deliver your purchase, and pass them to our courier.

### Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your purchase history to send you or make available personalised offers.

We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand, or develop new products/services.



We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

#### 4. When do we collect your personal data?

- When you visit any of our websites, and use your or your employing businesses account to buy products and services.
- When you make an online purchase and check out as a guest (in which case we just collect transaction-based data).
- When you create an account with us, on behalf of your employing business.
- When you purchase a product by phone but don't have (or don't use) an account.
- When you contact us by any means with queries, complaints etc.
- When you choose to complete any surveys we send you.
- When you fill in any forms on our websites – e.g. a catalogue request forms, or on-line support chat services.

#### 5. What sort of personal data do we collect?

The Wixroyd Group supplies products and services almost exclusively on a business-to-business contractual basis. Any personal information we collect relates only to an individual's role as an agent for their employer of business in fulfilling the business-to-business contract – we do not endeavour to collect any personal data other than to perform that contract. The data collected to perform the contract typically includes;

- If you have a web account with us: business name, billing and delivery addresses, name and email address of responsible persons placing orders, or making payment for orders on behalf of the business, orders and receipts, email and telephone number. For your security, we'll also keep an encrypted record of your login password.
- Details of the businesses or employing company's interactions with us through online services, email communications, on online support/chat services, history of any visits to the business site.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, web pages you visit and how and when you contact us.

- Details of your visits to our websites, and which site you came from to ours.



- Information gathered by the use of cookies in your web browser. Learn more about how we use cookies and similar technologies – see our Cookies policy.
- Payment card information.
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.

## 6. How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you. In the case of loyalty scheme members, we'll also offer you relevant rewards.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

### Here's how we'll use your personal data and why:

- To process any orders that you make by using our websites, of calls to our customer service centre. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered, and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.

For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations.

- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- Operating almost exclusively on a business-to-business basis, the Group complies with the Privacy and Electronics Communications Regulations (PECR) most relevant to the communications between businesses, and agents of businesses. In this context the Group will use your personal data, preferences and details of your transactions to keep you informed by email, web, telephone and through our customer service centres about relevant products and services.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

For example, we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having

- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in your online account.

## **7. Combining your data for personalised direct marketing**

We want to bring you offers and promotions that are most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data gathered across the Group as described above.

## **8. How we protect your personal data**

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.



We secure access to all transactional areas of our websites and apps using 'https' technology.

We regularly monitor our system for possible vulnerabilities and identify ways to further strengthen security.

#### **9. How long will we keep your personal data?**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

For example when you place an order, we'll keep the personal data you give us for five years so we can comply with our legal and contractual obligations. In the case of certain products, we'll keep the data for 10 years.

#### **10. Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, technicians visiting your home, for fraud management, to handle complaints, to help us personalise our offers to you and so on.

For example, delivery couriers, technicians visiting your home, for fraud management, to handle complaints, to help us personalise our offers to you and so on.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Direct marketing companies who help us manage our electronic or paper based communications with you.
- Google to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. See our [Cookies Notice](#) for details.

- Data insight companies to ensure your details are up to date and accurate.

- We may, from time to time, expand, reduce or sell the Group and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.
- For further information please contact our Data Protection Officer.

We do not share your data with third parties for their own purposes.

## 11. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), such as Australia or the USA.

If you are based outside the UK and place an order with us, we will transfer the personal data that we collect from you to the Group in the UK.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## 12. What are your rights over your personal data?

An overview of your different rights

You have the right to request:

- A copy of any information about you that the Group holds at any time, and also to have that information corrected if it is inaccurate - free of charge in most cases but we reserve the right to make a small charge were appropriate.
- If we choose not to action your request we will explain to you the reasons for our refusal.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- To ask for your information, please contact Data Protection Officer, The Wixroyd Group, Alexia House, Littlemead Industrial Estate, Cranleigh, Surrey, GU6 8NE, or email [info@wixroyd.com](mailto:info@wixroyd.com).

To ask for your information to be amended, please update your online account, or contact our Customer Services team.

Where we rely on our legitimate interest



In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

#### Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

#### Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

### **13. How can you stop the use of your personal data for direct marketing?**

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular division.
- If you have a web account, log in into your account on our website and , visit the 'My Account' area and change your preferences.
- Write to Data Protection Officer, The Wixroyd Group, Alexia House, Littlemead Industrial Estate, Cranleigh, Surrey, GU6 8NE, or email [info@wixroyd.com](mailto:info@wixroyd.com).

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

### **14. If you live outside the UK**

For all non-UK customers

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

Automotion Components Ltd, Alexia House, Littlemead Ind Est, Cranleigh, Surrey, GU6 8NE  
Tel: 01483 266774, Fax: 01483 266775, Email: [sales@automotioncomponents.co.uk](mailto:sales@automotioncomponents.co.uk), Web: [www.automotioncomponents.co.uk](http://www.automotioncomponents.co.uk)

Co Registration no. 2761902, Vat No. GB 566 9902 88

Bank Details : Barclays Bank PLC, A/C no. 00577758, Sort Code. 20-03-79

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This may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers in the UK.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

#### **15. Any questions?**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

Email us at [info@wixroyd.com](mailto:info@wixroyd.com)

Or write to us at The Wixroyd Group, Alexia House, Littlemead Industrial Estate, Cranleigh, Surrey, GU6 8NE

This notice was last updated on 04/05/2018

Signed by

A handwritten signature in blue ink, appearing to be "M.E.".

Managing Director. May 2018



# MIDDLETON

## INSURANCE SERVICES

OLD CHAPEL • 16 FLANSHAM LANE • FELPHAM • WEST SUSSEX • PO22 6AB • TEL : 01243 582293 • FAX : 01243 585529

Automotion Components Ltd  
Alexia House - Unit 7  
Williams Court  
Littlemead Industrial Estate  
Cranleigh  
GU6 8ND

Date: 12<sup>th</sup> April 2018

Dear Anthony & Silke,

To whom it may concern,

Existing policy: PC02 021487311

Insurer	Policy Number	Cover	Limit of indemnity	Period of insurance
Covea Insurance Plc	PC01 021487311	Employers Liability	£10,000,000 any one occurrence	31 <sup>st</sup> March 2018 to 31 <sup>st</sup> March 2019
Covea Insurance Plc	PC01 021487311	Public Liability	£5,000,000 any one occurrence	31 <sup>st</sup> March 2018 to 31 <sup>st</sup> March 2019
Covea Insurance Plc	PC01 021487311	Products Liability	£5,000,000 in aggregate	31 <sup>st</sup> March 2018 to 31 <sup>st</sup> March 2019

Please note the total Public Liability limit for the above policies is £5,000,000 any one occurrence

All of the Insurances described above fall due for renewal next on 31<sup>st</sup> March 2019 and contain a general Indemnity to Principals clause.

The insurances evidenced by this letter are subject to the terms, conditions and exclusions of the applicable policies. The letter is issued for information purposes only and evidences the coverage as of the date of this letter. The information confers no rights to the holder and imposes no liability on the Insurers. This letter assumes no liability to the holder to provide any notice of any material change in or cancellation of these policies.

Yours sincerely,

Chris Rowley  
Middleton Insurance Services Ltd