

# TrustLube's Privacy Policy



January 2019

Version 1

## Contents

<b>1.</b>	<b>Privacy Statement</b> .....	<b>3</b>
<b>2.</b>	<b>When do we collect information?</b> .....	<b>3</b>
<b>3.</b>	<b>What kind of information do we collect?</b> .....	<b>3</b>
3.1.	Submitted Information .....	3
3.2.	Additional Information .....	4
3.3.	Special categories of information .....	4
3.4.	Security assurance, fraud & data breach prevention .....	4
<b>4.</b>	<b>How do we use the information?</b> .....	<b>4</b>
4.1.	To do business with you as a supplier to you (queries, web shop, service etc.) .....	4
4.2.	To do business with you as a vendor .....	4
4.3.	Marketing .....	5
4.4.	Business analytics .....	5
4.5.	Employment .....	5
4.6.	Information processing & transfer .....	5
4.7.	Intercompany .....	5
<b>5.</b>	<b>Legitimate basis of processing your information</b> .....	<b>5</b>
<b>6.</b>	<b>Children’s information</b> .....	<b>6</b>
<b>7.</b>	<b>Where we store and process your information</b> .....	<b>6</b>
<b>8.</b>	<b>How long will we retain your information?</b> .....	<b>6</b>
<b>9.</b>	<b>Disclosing your information</b> .....	<b>6</b>
<b>10.</b>	<b>Your privacy rights and access to information</b> .....	<b>6</b>
<b>11.</b>	<b>Third party sites and services</b> .....	<b>7</b>
<b>12.</b>	<b>Submitting communications or ideas through our site</b> .....	<b>7</b>
<b>13.</b>	<b>Cookies and similar technologies</b> .....	<b>7</b>
<b>14.</b>	<b>Changes to this privacy statement</b> .....	<b>8</b>
<b>15.</b>	<b>Questions or remarks about this policy</b> .....	<b>8</b>

## 1. Privacy Statement

This Privacy Statement applies to your use of any of our online, mobile and social services or applications and via any other means through which you may interact with TrustLube (hereafter called the "**our Services**").

This Privacy Statement sets out the basis on which information that we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your Information and how it will be treated. If you do not agree with the terms, do not access or use the services, websites, or any other aspect of the Services.

## 2. When do we collect information?

When you use our Services we automatically collect and store certain information. This information includes the device's unique device identifiers, operating system and mobile network information, date, time and duration of your use, your location, what materials you have up- or downloaded, through which link you got to IHC, information about what parts of the Services you use. This information is processed in our server logs to get a better understanding of how people use the Services, for system administration- and security purposes, and to ensure we provide a good user experience and customer service.

*For our cookie policy please refer to Section 13 of this Privacy Statement.*

## 3. What kind of information do we collect?

We may collect and process the following information about you:

### 3.1. Submitted Information

We may collect any information that you provide to us when:

- You register to use any of our Services (e.g. when you download information, register for an event, seek to be contacted by a TrustLube representative, click a "yes" button for marketing communications).
- You subscribe to TrustLube publications (e.g. a newsletter).
- You seek employment with TrustLube.
- You seek to conduct business with TrustLube.
- You create an account or complete details of any profile using the Services.
- You post, upload or share any material or content through any of the Services (e.g. surveys, comments on articles).
- You report a problem with any of the Services.
- You make a transaction using one of our Services.
- The Log information.

This kind of information may include your name, email address and other contact details such as your addresses, phone numbers etc. It may also include biographical information such as career information and your date of birth. We may also collect information necessary to perform financial transactions.

### 3.2. Additional Information

If you contact us with a complaint or query about our products or services we may keep a record of that correspondence to ensure we provide good customer service. We may also ask you to complete surveys about our products and services that we use for research purposes, although you do not have to respond to such surveys.

### 3.3. Special categories of information

TrustLube will not process Information which is considered “as special category” information. Please do not volunteer that type of Information.

This category of information includes:

- Race and ethnicity
- Genetics
- Sexual orientation
- Religion
- Political information
- Membership of a trade union
- General health

### 3.4. Security assurance, fraud & data breach prevention

The information you submit will be processed through a variety of technical and organizational means, with the objective to assure your privacy, to prevent data breaches, to detect unethical content and to proactively protect the integrity of our systems.

We may also use your information to ensure the security of your use of our Services, any user accounts you may have with us and our business, as well as for the purposes of preventing or detecting fraud or abuse of our Services.

## 4. How do we use the information?

Information will only be used in accordance with the purpose for which it was collected.

### 4.1. To do business with you as a supplier to you (queries, web shop, service etc.)

We use this Information to enable you to make use of the Services and to enable us to provide a good level of customer service. The foregoing including financial transactions.

### 4.2. To do business with you as a vendor

We use this Information to engage in business transactions with you acting as a product or service vendor to TrustLube, including financial transactions.

### 4.3. Marketing

We may also use your information to provide you and your organization with information about our products and services which may be of interest to you and your organization.

If you do not want us to use information in this way, you can opt-out by clicking 'unsubscribe' in the email footer of the marketing communication that we send to you.

Please note that if you opt out from receiving marketing communications, we may still contact you about service-related issues, such as where we make any changes to the Services, any terms and conditions or this Privacy Statement.

### 4.4. Business analytics

We may use the Information to conduct e.g. market surveys, analyze business performance, client satisfaction, product and Service performance.

### 4.5. Employment

We use the information submitted for employment purposes to review your candidacy, including but not limited to suitability for the job, career history, professional qualifications. In addition, the information may be used to review your postings on social media such as LinkedIn, Facebook and similar (social) media.

### 4.6. Information processing & transfer

TrustLube is using processing and other services from third parties in the ordinary course of business. Information may be shared with these parties.

### 4.7. Intercompany

TrustLube is using the information throughout the entire TrustLube Group of companies.

## 5. Legitimate basis of processing your information

It is of paramount importance to TrustLube that it processes information on a legal basis. This means that the 'legal basis' for TrustLube processing your information as described above will typically be one of the following:

- It is necessary to fulfil a contract that we have in place with you or prepare for.
- For our or our third parties' legitimate business interests.
- Your consent.
- Where the processing is necessary for compliance with our legal obligations, such as tax and accounting or safety.

The above does not limit your Privacy Rights as further explained below in Section 9.

## 6. Children's information

If you are under the age of 16, you are not allowed to use any of our Services or create an account with us unless parents / guardians have provided their consent.

## 7. Where we store and process your information

The information may be processed and stored at a location outside of your country which may have different privacy protection laws than those of your country.

The information may also be processed and stored by TrustLube entities and service providers outside the EEA. Whenever we transfer Information outside of the EEA, TrustLube will take legally required steps to ensure that adequate safeguards are in place to protect your Information and to make sure it is treated securely and in accordance with privacy protection laws.

## 8. How long will we retain your information?

Your information will be retained for as long as is reasonably necessary for the purposes listed in paragraphs 2 and 3 above or as required by applicable law. Because retention periods are very different from country to country and dependent on the nature of the information, it is not feasible to provide exact details, but information will not be retained longer than is reasonably necessary for the purpose or as prescribed by law.

## 9. Disclosing your information

We may disclose your Information to any other TrustLube Entity.

We may disclose your information to third parties:

- a) If TrustLube retains a service provider to process information or to deliver services to TrustLube.
- b) If we partner or work with a third party to help us provide Services to you.
- c) If we are under a duty to disclose or share your Information to comply with any legal or regulatory obligation or request.

We may also disclose your information:

- a) To enforce any agreements that we may have with you or to investigate potential breaches.
- b) To protect the rights, property or safety of us, the users of our Services, or others.

## 10. Your privacy rights and access to information

TrustLube acknowledges that the information contains personal information about you and that you have a legitimate interest in managing your personal information and understanding how TrustLube processes your information. This Privacy statement is intended to clarify that.

Data protection legislation gives you rights with respect to your Information. These rights differ by country/region but your Privacy Rights in relation to TrustLube include in any event:

- The right to object to or withdraw consent to the processing of your information.
- The right to a copy of your information.
- The right to rectify incorrect information.
- The right to request deletion of your information.
- The right to be informed about the retention periods or retention criteria.
- The right to request a restriction of the processing of your information.
- To request to receive a machine-readable copy of your information.
- The right to receive information about data transfers outside of the EEA.
- The right to request information about data processing.
- The right to seek legal remedies in case of an infraction on your privacy rights.
- The right to lodge a complaint with Data Protection Agencies.

We will handle any request to exercise your Privacy Rights in accordance with applicable law.

If you wish to exercise Privacy Rights please contact the QHSES Manager. Contact details can be found below.

## 11. Third party sites and services

Our Services may contain links to and from various other websites. If you follow a link to any such websites, please note that these websites have their own privacy notices and policies and we cannot be held responsible for them.

Your use of any of our online or mobile applications will also be subject to the privacy notices and policies of any app store provider and/or operator ("App Store Provider") from whom you have downloaded the app.

Please check these third party privacy notices and policies before providing any Information to any other website or App Store Provider.

## 12. Submitting communications or ideas through our site

Any communications or other information you send to TrustLube through its websites are on a non-confidential basis, and TrustLube is under no obligation to refrain from reproducing, publishing, or otherwise using them in any way or for any purpose. TrustLube shall be free to use the content of any such communications, including any ideas, inventions concepts, techniques or know-how disclosed therein, for any purpose including developing, manufacturing and/or marketing goods or Services. The sender of any communications to TrustLube websites shall be responsible for the content and Information contained therein, including its truthfulness and accuracy.

## 13. Cookies and similar technologies

Some of the Services such as our website and mobile apps use cookies and technologies which are similar to cookies ("Cookies"). A Cookie is a small file of letters and numbers that we may set on your device to store and sometimes track information about you. The Cookies and similar technologies we use are designed for "analytics". This allows us to distinguish you from other users of the website or other of our Services. This helps us to provide you with a good experience when you use the website or other Services and also to improve the Services. More information on deleting or managing cookies is available at <http://www.allaboutcookies.org/>.

A more detailed list of the Cookies used when providing the Services is set out by category below:

### **Strictly Necessary Cookies**

These Cookies are essential to enable you to move around our websites or other Services and enable you to use certain features and Services that you have specifically asked for. Without these Cookies, certain Services that you have asked for cannot be provided. They are deleted when you close the browser.

### **Performance Cookies**

These Cookies collect Information about how you use the Services to allow us to improve them and identify which parts are most important to you and your use of the Services. All of the Information these Cookies collect is aggregated and does not seek to personally identify you.

### **Functionality Cookies**

These Cookies remember the choices you make when using the Services (such as your user name, language, preferences, country codes or Information as to the country or region you are in) and provide enhanced, more personal features to improve your experience.

### **Your choices and opting-out**

You have the ability to accept or decline Cookies by an individual decision or by modifying your browser or app settings. If you choose to decline Cookies, you may not be able to fully experience the interactive features of our websites, platforms and Services.

## **14. Changes to this privacy statement**

We may change this Privacy Statement at any time by updating the policy on our website which will notify you of a change when you next use the Services. The new Privacy Statement may be displayed on-screen and you may be required to read it to continue your use of the Services. The date this Privacy Statement was last updated appears below.

## **15. Questions or remarks about this policy**

Please contact our Quality Health Safety Environment & Sustainability (QHSES) Department on [ethicsandcomplicance@trustlube.com](mailto:ethicsandcomplicance@trustlube.com) for any questions or potential violations.