

Brother Industries (UK) Limited (BIUK) is a wholly owned subsidiary of Brother Industries Ltd Japan (BIL) based in Nagoya Japan. We are a manufacturing operation and produce a diverse range of products including consumer and industrial electronics, consumables, general product assembly, and plastic injection moulding. Our core business areas include (but are not limited to):

- Manufacture of consumer and industrial products
- Recycling and refurbishment of laser printer cartridges
- Packaging of inkjet cartridges
- Plastic injection moulding and general assembly work
- Providing innovative services to support our sales organisation

Our vision is to be the Recycling Technology Centre for the Brother Group

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## Reason for Policy

Brother is committed to respecting and protecting your privacy when you are accessing and using our services. This policy sets out how we use, collect, transfer, store and disclose your data.

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## Scope

Company wide

## Definitions

## Linked documents

Parent Policy - GDPR Policy (GDPR-01)

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## Approved by

Craig McCubbin  
Managing Director

Andy Dutton  
Director

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## Brother's European Group Privacy Policy

This Privacy Policy together with any applicable Website Terms of Use and Cookies Notice set out Brother's use of personal information collected from you via the online services listed below, whether as a guest or a registered user:

- any Brother website that links to this Privacy Policy ("**Website**");
- Brother Web Forms;
- mobile device applications;
- Omnijoin;
- Managed Print Services;

This Privacy Policy also sets out how Brother uses personal information provided to Brother by alternative means such as by phone, email or alternative correspondence.

Where you use a particular service which is available through a Website there may be additional terms and conditions which apply to the processing of your personal information, so it is important that you read the applicable terms and conditions for each service that you use. In the event and to the extent of any conflict or inconsistency between such additional terms and conditions and this Privacy Policy, the terms and conditions for a particular service will prevail over this Privacy Policy.

In addition, a Website may, from time to time, contain links to and from the websites of our partner networks, advertisers, affiliates or other third parties. If you follow a link to any of these websites, please note that these websites have their own privacy and cookie policies governing their use of your personal information which we highly recommend that you review carefully prior to submitting any of your information. Brother does not accept any responsibility or liability for these policies and the privacy practices of such third party websites.

The European arm of the Brother group has nominated the Information Commissioner's Office of the United Kingdom as its lead data protection authority for the purpose of the General Data Protection Regulation (the "**Regulation**").

The Brother group is committed to establishing and maintaining high standards in the area of data privacy, protecting employee and customer data from misuse and promoting the principles of data protection. This Privacy Standard applies across the Brother European Companies and sets out the standards expected of all European Brother companies and employees.

## 1. Who is Collecting Information?

Brother International Europe Limited, a limited company registered in England and Wales under company number 664172 whose registered office is at Brother House, 1 Tame Street, Audenshaw, Manchester M34 5JE ("**Brother**") is the European headquarters of the Brother group. Brother Industries (UK) Limited, a limited company registered in England & Wales under company number 01888853 whose registered office address is at Vauxhall Industrial Estate, Ruabon, Wrexham, LL14 6HA. Both of these companies control data collected through or in connection with a Website or any of the online services listed above.

Brother International Europe Limited is the European headquarters of Brother Industries Limited, based in Nagoya Japan. Brother is a global manufacturer and distributor of printer and sewing machinery and business solutions, operating in over 40 countries globally.

## 2. Information We Collect

Brother may collect and process information about you such as:

- Information that you may provide when filling in forms on, or otherwise submitting or making available information to, a Website. This includes for example any:
  - information provided when registering as a user of a Website or for any services made available by Brother; and

- information provided in any documents, materials, communication or other content uploaded, transmitted, shared, distributed or otherwise made available by you in connection with your use of any Websites or services provided by Brother (including without limitation any video and/or sound recordings of any web conferences hosted or attended by you via the Omnijoin from time to time).

- If you contact us for any reason, Brother may keep a record of that correspondence.
- Information that may be captured via any error logging and reporting tool that captures error report data and, at your option, sends this data to Brother in order for Brother to be informed of any software errors or problems that may occur during your use of a Website or any other Brother services.
- Details of your visits to the Websites, the activities you engage in when using the services made available by Brother, whether or not via the Websites and the resources that you access on or via the Websites.

## 3. How We Use Your Information

Brother may use information held about you in the following ways:

- To present content and information on Brother websites in the most suitable manner for you and the equipment and devices from which you view the websites;

- To provide you with information, products or services that you request from Brother or which Brother feels may interest you, where you have consented to be contacted for such purposes;
- To provide you with any services that you may request from Brother from time to time (whether paid for or not), to communicate with you in relation to those services and to process any orders for products or services as appropriate; or
- To manage and administer your accounts and contact you as may from time to time as necessary in connection with your use of the Websites and/or Brother's services, including, but not limited to, notifying you about changes to our website services and the basis on which these are provided.

In certain circumstances Brother may provide third parties with aggregate information about users of its Websites. This may include information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

## 4. Omnijoin web-conferencing

In respect of your use of Brother's Omnijoin services or any related Websites, you should be aware that any personal information that you submit or make available in connection with your use of our web-conferencing services in which you participate is visible and available to all persons participating in that conference. The personal information you share, display, submit, upload or transmit during a conference may be read, collected, used, recorded, distributed and/or re-transmitted by other participants of the conference for any purpose. Brother is not responsible for any use of your personal information by another participant in a conference or any other third party.

The web conferencing services available on the Omnijoin Website include a remote access and file transfer function. By using these functions, you may remotely transfer files from your own computer or other device ("**Device**"), to a Device of another conference participant, as well as access and transfer files from another participant's Device to your own Device. Consequently, you may permit other participants in the conference to access and transfer from your Device files held on your Device by clicking on the [share document] and/or [share desktop] button when prompted. **If you do not wish to allow other participants to remotely access your Device and any data stored on your Device, do not click on the [share document] button or [share desktop] button when prompted.**

Brother is not responsible for the use of any remote access functions by you or any Omnijoin conference participant, nor for any data or information accessed, submitted or transmitted through such remote access functions. You are solely responsible for your use of the remote access functions and any resulting use of the data accessed by you. It is your responsibility to ensure that only the conference participants who have permission to access files and data on your Device are granted such access. It is also your

responsibility to ensure that conference participants to whom you grant such access are made aware of the way in which such data and files can be used and any restrictions on the use or transmission of such data and files. You must only access and/or use data from another conference participant's Device to the extent such conference participant has given you their consent.

## 5. Where We Store Your Data

Generally, Brother will store and process your personal information within the European Economic Area. However, the data that Brother collects from you may be transferred to, and stored at, a country outside the European Economic Area, the laws of which may not provide the same level of protection for your data, although we will always ensure it receives an equivalent level of protection and that any organisations processing your personal data outside of the European Union or the Brother Group must comply with our express instructions regarding your personal information.

Although Brother will endeavour to protect your personal information once Brother receives it, transmission of information to us or from us via the internet is not completely secure and your sending of information to us online is at your own risk. For the avoidance of doubt, Brother accepts no liability for any loss or damage you may suffer as a result of such transmission.

Where Brother has given you, or where you have chosen, a password to access certain parts of a Website or your registered user account, you should not share this password with others.

## 6. Updating Your Information?

Where you submit information to Brother, you should try to ensure such information is accurate, and let us know if such information changes so that we are not holding any inaccurate information about you. If you have registered an account for a Website, you can review and update your personal information yourself at any time by logging in to your account.

## 7. Disclosure of Your Information

Brother will keep your personal information within the Brother group except where disclosure is required or permitted by law. Please note that some Brother group companies are situated outside of the European Economic Area. Please see the "Where we store your data" section above for further information.

Generally, we will not disclose your personal information outside of the Brother group but occasionally Brother may disclose personal information with appropriate safeguards in place in the following circumstances:

- If Brother sells any business or assets, in which case Brother may disclose your personal information to the prospective buyer of such business or assets;
- If Brother or substantially all of our assets are acquired by a third party, in which case personal information held by Brother about you and its other customers will be one of the transferred assets;

- If Brother sub-contracts any services which require the processing of your information, for example, where a third party is engaged: (i) to provide and maintain any IT equipment used to store and access your personal information; (ii) to host and maintain this website; or (iii) otherwise in connection with the provision of certain services provided to you on or via this website; and
- If Brother is under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply any Terms of Use relevant to a Website; or to protect the rights, property, or safety of any person (including for example for the purposes of fraud detection and prevention).

## 8. When Will Brother Contact Me for Marketing Purposes?

Brother will inform you (when collecting your information) if Brother would like to use your data for marketing purposes but will only do so if you give your consent to such use of your personal information. You can exercise your right to prevent such use when Brother collects your data by indicating that you do not want to be contacted for marketing purposes. You can also tell Brother should you change your mind about this at a later date by contacting Brother at [email address] or via your Website account.

## 9. How Long Will Brother Keep My Information?

Brother will retain your information for as long as necessary for the relevant activity for which the information was provided. If you delete a Website account, your personal information is either deleted or anonymised and used solely for analytic purposes.

Information provided via Web Forms is retained and used for a period of 6 months and is then anonymised and used solely for analytical purposes.

## 10. Your rights

Under the Regulation, you have the right to request details of any information held about you and in some circumstances you may also request the deletion of personal information or that we cease processing your personal information. Should you request access to any information held about you, Brother will process such request in accordance with the Regulation as such may be amended, varied or supplemented from time to time. In order to ensure that any such request is genuine and that we do not make disclosure of personal information to anyone other than the data subject, we request that you provide two forms of identification when making a request (these may be passport, driving licence, birth certificate, bank statement or utility bill). You can delete an account on a Brother Website by following the procedures set out in your Brother Online account.

## 11. Cookies

Brother uses cookies on its Websites. For more information on the cookies Brother Uses, and the purposes for which Brother uses them, please see our Cookies Notice [link].

Cookies are small pieces of data which may include unique identifiers which are sent to your computer, mobile phone or tablet. They are used to store or retrieve information about you and your device, usually in order to give you a personalised web experience.

## 12. Changes to This Privacy Policy

Brother may change this Privacy Policy from time to time, and will indicate this on this page or elsewhere on the Website. You are expected to check this page from time to time to take notice of any changes we have made as they are binding on you.

## 13. Further Information About Protection of Personal Data and the General Data Protection Regulation

To find out more about protecting your personal information visit the Information Commissioner's Office website.

If you want to contact us with specific queries or concerns in relation to this Privacy Policy, please contact us at [privacy@biuk.co.uk](mailto:privacy@biuk.co.uk).