

Privacy Notice

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1. Introduction

1.1 The Adelphi companies listed in this Privacy Notice are committed to protecting your privacy and processing your personal information transparently and in accordance with applicable data protection laws. This Privacy Notice explains what personal information we collect, how we use it, who we share it with and your rights in relation to that information.

2. Responsibility for Your Personal Information

2.1 This Privacy Notice applies to the following companies:

- Adelphi Holdings Limited
- Adelphi (Tubes) Limited, trading as Adelphi Healthcare Packaging
- Adelphi Manufacturing (Company) Limited
- Adelphi Masterfil Limited
- Coldstream (Engineering) Limited
- Pharma Hygiene Products Limited
- Adelphi Holdings Group LLC, trading as Adelphi Healthcare Packaging USA

2.2 Each of the above companies is a separate data controller for the personal information it processes.

2.3 References in this Privacy Notice to "Adelphi", "we", "us" or "our" mean the relevant Adelphi company with which you interact, contract or otherwise have a business relationship.

2.4 A "data controller" is the organisation that determines how and why personal information is processed.

2.5 If you have any questions about how your personal information is used or wish to exercise any of your data protection rights, you may contact us using the details provided at the end of this Privacy Notice.

3. Categories of Personal Data

3.1 Adelphi collects, processes and uses the following categories of personal data about you:

- name;
- title/position;
- business contact information;
- employer name;
- content of communications (such as emails and business correspondence);
- website registration details and information about your use of our websites, including information collected through cookies and similar tracking technologies;
- contract details;
- services or products provided or offered;
- invoice and payment information;

- business relationship history; and
- marketing preferences.

3.2 Personal data may be collected directly from you, from the organisation you represent, from publicly available sources, from other companies within the Adelphi Group, from agents, distributors, suppliers and event organisers, or from other third parties, including business contact and prospect data providers, where permitted by law.

3.3 We use cookies and similar tracking technologies on our websites to support website functionality, understand how visitors use our websites and, where applicable, support our marketing activities. Further information about the cookies and similar technologies used on each website, including how you can manage your preferences, is available in the Cookie Policy on the relevant Adelphi company website.

4. Purposes of the Personal Data Processing

4.1 Personal data is collected, processed and used to:

- establish and maintain relationships with customers, suppliers and other business contacts;
- provide, receive and administer products and services;
- process enquiries, quotations, contracts, orders, invoices and payments;
- communicate with customers, suppliers and business contacts;
- comply with legal, regulatory and corporate governance requirements;
- undertake marketing and customer relationship management activities;
- protect Adelphi's business, assets, systems and information; and
- prevent and detect fraud and other unlawful activities.

5. Legal Basis

5.1 Adelphi will only process personal data where there is a lawful basis to do so under applicable data protection legislation. The lawful bases on which we rely include:

- Consent - Where required by law, Adelphi will seek your consent before processing your personal data. You may withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.
- Performance of a Contract - Adelphi may process personal data where it is necessary to enter into, perform or administer a contract with you or the organisation you represent, including processing orders, supplying products and services, and administering payments.
- Compliance with Legal Obligations - Adelphi may process personal data where necessary to comply with legal, regulatory, tax, accounting or other statutory obligations.
- Legitimate Interests - Adelphi may process personal data where it is necessary for its legitimate business interests, provided those interests are not overridden by your rights and freedoms. This may include managing business relationships, responding to enquiries, administering contracts, improving products and services, maintaining network and information security, and preventing fraud.

6. Categories of Recipients

6.1 Access to personal data is restricted to employees, contractors and other authorised individuals who require access for a legitimate business purpose or where required by law.

6.2 Adelphi may share personal data, where necessary and appropriate, with:

- other companies within the Adelphi Group;
- agents, distributors and suppliers;
- service providers who support our business operations, including IT, telecommunications, website hosting, cloud storage and software service providers;
- professional advisers, including accountants, auditors, legal advisers and insurers;
- regulatory bodies, governmental authorities, law enforcement agencies and courts;
- financial institutions and payment service providers; and
- any other third party where disclosure is required or permitted by law.

6.3 Where third parties process personal data on Adelphi's behalf, appropriate contractual and security measures are implemented to protect that information.

7. International Transfers

7.1 Adelphi may use third-party service providers who process personal data on its behalf.

7.2 In certain circumstances, personal data may be transferred to, stored in, or accessed from countries outside the United Kingdom, including where personal data is shared with other Adelphi companies located outside the United Kingdom.

7.3 Where personal data is transferred outside the United Kingdom, Adelphi will ensure that appropriate safeguards are in place and that such transfers are carried out in accordance with applicable data protection laws.

7.4 Further information regarding any international transfers and the safeguards applied may be obtained by contacting Adelphi using the contact details provided in this Privacy Notice.

8. Retention Period

8.1 Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, tax, accounting and reporting requirements, and to establish, exercise or defend legal claims.

8.2 Retention periods are determined with reference to the nature of the information, the purpose for which it is processed, applicable legal requirements and legitimate business needs.

9. Security

9.1 Adelphi is committed to protecting the security of personal data and implements appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

9.2 Access to personal data is restricted to authorised individuals who require access for legitimate business purposes and who are subject to appropriate confidentiality obligations.

10. Data Subject Rights

10.1 You have certain rights under applicable data protection legislation in relation to the personal data Adelphi processes about you.

10.2 In certain circumstances, you may have the right to:

- withdraw your consent, where processing is based on consent;
- request access to your personal data;
- request rectification of inaccurate or incomplete personal data;
- request erasure of your personal data;
- request restriction of the processing of your personal data;
- object to the processing of your personal data;
- request the transfer of your personal data to another organisation, where the right to data portability applies; and
- lodge a complaint with the Information Commissioner's Office (ICO).

10.3 If you receive marketing communications from Adelphi, you may opt out at any time by using the unsubscribe link included in the communication or by contacting us at policy@adelphi.uk.com.

10.4 These rights are not absolute and may apply only in certain circumstances. Adelphi may request information to verify your identity before responding to a request.

11. Contact Information

11.1 If you would like further information about how Adelphi processes your personal data, wish to exercise any of your data protection rights, or have a complaint regarding the processing of your personal data, please contact:

Postal Address:
For the attention of the Data Protection Compliance Officer
Olympus House
Mill Green Road
Haywards Heath
West Sussex
RH16 1XQ

Email: policy@adelphi.uk.com

Telephone: +44 (0)1444 472300

11.2 If you have concerns about how your personal data has been handled, please contact us in the first instance so that we can investigate and respond.

11.3 You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent supervisory authority for data protection matters.