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## Third Party Privacy Notice

### 1. INTRODUCTION AND SCOPE

At Spectris plc (referred to in this Privacy Notice as 'Spectris', 'we' or 'us'), we take privacy serious. We see it as our duty of care to protect your personal data and to ensure that all personal data is used in accordance with applicable data protection laws.

We appreciate the interest you have shown in us, our products and services by visiting us at [www.spectris.com](http://www.spectris.com) (the '**Website**') or by reading any of our online communications through channels such as our social media pages (collectively the '**Online Channels**'). This Privacy Notice explains what kind of personal data is collected and how it is used by Spectris when you interact with us, such as through visiting our Website, your contact via [info@spectris.com](mailto:info@spectris.com), your subscription to our email updates or any other interaction with Spectris, including without limitation all online and offline collection of personal data, and your rights in respect of your personal data. This Privacy Notice does not apply to personal data of job candidates obtained through our Careers webpage, which is subject to the Spectris Recruitment Privacy Notice (available on the [Careers webpage](#)) or to personal data obtained for our third party due diligence process, which is subject to the [Third Party Due Diligence Privacy Notice](#) (available on the Spectris Website).

This Privacy Notice may be changed over time and was last changed in May 2021. The most up-to-date Privacy Notice is published on our Website and we encourage you to periodically review the Website for any changes to this Privacy Notice.

### 2. WHO WE ARE

Spectris' global group of businesses are focused on delivering value beyond measure for all our stakeholders. We target global, attractive and sustainable markets, where growth and high returns are supported by long-term drivers. Precision is at the heart of what we do. We provide customers with expert insight through our advanced instruments and test equipment, augmented by the power of our software and services. This equips customers with the ability to reduce time to market, improve processes, quality and yield. In this way, Spectris know-how creates value for our wider society, as our customers design, develop, test and manufacture their products to make the world a cleaner, healthier and more productive place.

Headquartered in Egham, Surrey, United Kingdom, the Company employs approximately 7,650 people located in more than 30 countries.

### 3. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Spectris, based at Heritage House, Church Road, Egham Surrey TW20 9QD, United Kingdom, is the controller for the processing of personal data that falls within the scope of this Privacy Notice.

If you have any questions about this Privacy Notice, your use of the Website or your dealings with us, in relation to our use of your personal data or your rights in relation to your personal data, you can contact us via [data.protection@spectris.com](mailto:data.protection@spectris.com).

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### 4. FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

#### 4.1 For answering your questions and following up on your requests

**i. What does this purpose entail?**

If you get in touch with us, for example through [info@spectris.com](mailto:info@spectris.com), we will respond to your enquiry using your personal data.

**ii. On what lawful basis do we process personal data?**

We process your personal data on the basis of our legitimate interest in managing our relationship with existing and potential customers, suppliers, vendors and business partners.

**iii. Which personal data do we process for this purpose?**

For this purpose, we process your name, contact details, your correspondence with Spectris and any other personal data necessary for answering your question.

#### 4.2 To deliver you our Website's functionalities and for its technical and functional management

**i. What does this purpose entail?**

We process your technical data to offer you our Website's functionalities, for operational and troubleshooting purposes and to allow our Website administrators to manage and improve our Website's performance. If you enter data in our Websites (such as product preference or your location) to receive relevant information or functionalities, Spectris processes this data to provide you with the requested information or functionalities.

**ii. On what lawful basis do we process your personal data?**

We process your personal data on the basis of our legitimate interest in maintaining our Website's functionality.

**iii. Which personal data do we process for this purpose?**

For this purpose, we process the personal data you have entered into our Website or that is generated from the functionalities you have used on the Website and your IP address. Your geolocation is processed by our cookiemanager, to determine the cookie set-up required for you.

#### 4.3 For website security purposes

**i. What does this purpose entail?**

We process data to secure our website, for example to enable identification of attacks on the website and block these attacks.

**ii. On what lawful basis do we process your personal data?**

We process your personal data on the basis of our legitimate interest in safeguarding our Website's security.

**iii. Which personal data do we process for this purpose?**

For this purpose, we process your IP address and time stamp of your visit.

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### 4.4 Where applicable, for managing and sending email alerts

#### i. What does this purpose entail?

You need to provide us with your email address if you choose to subscribe to our Spectris Alerting Service. Upon registering, we will send you a confirmation email to complete your registration. We monitor whether the email alerts reach the subscribers, the number of times and the last time that the alert has been opened, the click count, and the links clicked. This information enables us amongst others to remove subscribers that appear to be no longer interested in receiving the email alerts.

#### ii. On what lawful basis do we process your personal data?

We process your personal data on the basis of your consent, which you may withdraw by opting out of receiving email alerts at any time and free of charge. You will always have the option to opt out of receiving these communications by following the instructions included in each communication or by opting out via our Website. Should you wish to opt out, we will no longer send you email alerts. We process personal data on the basis of our legitimate interest where we do so for maintaining our email alert process.

#### iii. Which personal data do we process for this purpose?

For this purpose, we process your email address.

### 4.5 For organisational analysis, management reporting, acquisition and divestitures and for the execution of business processes and internal management

#### i. What does this purpose entail?

If you are doing business with us or if you have subscribed to our email alerts, then we may process your personal data in the preparation and performance of management reporting and analysis using aggregated personal data. We may also conduct customer, supplier and business partner surveys to learn more about your views and opinions as part of the reporting process. Additionally, your personal data may be processed in the context of mergers, acquisitions and divestitures, and in order to manage such transactions.

We may process your personal data in the general performance and internal administration of our business. Furthermore, your personal data may be used when we conduct audits and investigations to comply with applicable legal obligations and/or Spectris' internal policies, implement business controls, and for managing our customer, supplier and business partner database.

When you are doing business with us, we also process your personal data for finance and accounting, archiving and insurance purposes, legal and business accounting and in the context of dispute resolution.

#### ii. On what lawful basis do we process your personal data?

We process your personal data in order to satisfy our legitimate interest in operating the day-to-day business of Spectris and to develop and implement plans for strategic growth.

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### iii. Which personal data do we process for this purpose?

For this purpose, we may process your contact details, your response to our surveys, data stored on Spectris' IT systems, data generated during the performance of your agreement with Spectris and your correspondence with us.

## 4.6 To comply with the law

### i. What does this purpose entail?

If you are doing business with us, then Spectris processes your personal data to comply with laws and regulations (such as tax and business conduct-related and due diligence obligations including know your customer requirements) and this may involve disclosing your personal data to government or other supervisory authorities.

### ii. On what lawful basis do we process your personal data?

We process your personal data to comply with any legal or regulatory obligations to which we may be subject.

### iii. Which personal data do we process for this purpose?

For this purpose, we process your contact details, such as your address and email address, personal details, such as your name, payment information, transaction history, and your chamber of commerce and tax details, and any other information requested by the relevant government or supervisory authority. Information regarding the processing of personal data as part of our due diligence process is provided in our [Third Party Due Diligence Privacy Notice](#).

## 4.7 To protect health, safety, security and to ensure integrity

### i. What does this purpose entail?

Where you are invited to Spectris' premises, we process your personal data in order to safeguard our employees, customers, suppliers and business partners as well as their assets. As such, we authenticate your access rights to our premises and may screen your personal data against publicly available government and/or law enforcement agency sanctions lists.

### ii. On what lawful basis do we process your personal data?

We process your personal data in line with our legitimate interest in safeguarding the health and safety of others, as well as in authenticating third party status and access rights whilst on our premises.

### iii. Which personal data do we process for this purpose?

For this purpose, we process your name, vehicle registration number and your visiting history to our premises. Information regarding the processing of personal data as part of our due diligence process is provided in our [Third Party Due Diligence Privacy Notice](#).

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### 5. FOR HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We will retain your personal data for as long as necessary for the purposes set out above or as communicated to you at the time of collecting your personal data. More in particular:

Data	Purpose	Retention
IP Address & time stamp of visit	To deliver Website's functionalities and for its technical and functional management (troubleshooting) (4.2) & for security purposes (4.3)	90 days
Geolocation	Cookiemanager (4.2)	Not retained
Email Address	For sending email alerts (after subscription) (4.4)	90 days after deregistering
Alert analytics (e.g. click rate)	For managing email alert Process (4.4)	90 days after deregistering

For any other personal data processed, the criteria we use to determine data retention periods include the following:

- **Retention in case of queries:** we may retain your personal data for a reasonable period after you have enquired about our company, in case of follow up queries from you.
- **Retention in accordance with legal and regulatory requirements:** we will consider whether we need to retain your personal data after the period of retention in case of queries (above) due to legal or regulatory requirements which they may be subject to. Some or all of these criteria may be relevant to retention of your personal data collected from you in connection with our company and/or your use of our Website.
- **Retention permitted under applicable law:** we will continue to retain your personal data where necessary to provide our services to you and the retention of such personal data is necessary for pursuing our legitimate interests or where it is necessary for public interest purposes.

### 6. COOKIES

We also collect information through the use of cookies. Cookies are small files of information which save and retrieve information about your visit to our Website – for instance, your internet service provider's domain name, pages you accessed and when. We may process data we collect to give you a more seamless, consistent and personalised experience such as providing you with personalised recommendations based on your use of the Website.

Read more about how we use cookies and how you can disable them in our Cookie Notice, which can be found [here](#).

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### 7. WHO HAS ACCESS TO YOUR PERSONAL DATA?

#### 7.1 Access to your personal data within Spectris

Your personal data will be available within Spectris to only those who need access to the data and only to the extent necessary to meet the purposes specified in **section 4 'For which purposes do we process your personal data?'** (above). We will take appropriate measures to ensure that your personal data is appropriately safeguarded.

We may also share your personal data with our affiliates within the Spectris group of companies. We may exchange your data for administrative purposes and so that we can have a complete overview of your contacts and contracts with the Spectris group. Where our affiliates send you information in relation to events, products, services or solutions that may be of interest to you, such disclosures will be pursuant to your consent (where required, in accordance with applicable laws).

#### 7.2 Access to your personal data by third parties

The following third parties have access to your personal data, where relevant:

- Banks
- Insurance companies
- IT suppliers, including website administrators
- Accountants and forensic specialists
- Governmental and regulatory bodies and other third parties to whom we must disclose information under applicable law, such as to comply with a court order or a request from a regulator or similar legal process, or otherwise where necessary to comply with a legal obligation or for the administration of justice
- Third parties concerned or their professional advisers, in the event of a merger, acquisition or any form of sale of some or all of our assets.

Where third parties are given access to your personal data, Spectris will take the required contractual, technical and organisational measures. If your personal data is transferred to a recipient in a country outside the European Economic Area that does not provide an adequate level of protection for personal data, we will provide for appropriate safeguards, for example conclude a contract encompassing the standard data protection clauses adopted by the European Commission with the relevant third party. A copy of such contract or more information about the appropriate safeguards taken to enable the transfer of personal data, can be obtained upon request via [data.protection@spectris.com](mailto:data.protection@spectris.com).

#### 7.3 Personal data obtained from third parties

We work closely with third parties (including business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics and search information providers) and may receive personal data about you from them. Such data obtained from third parties will be kept in accordance with the same duty of care as described in this Privacy Notice, and with any additional restrictions imposed by the third party that shared your personal data.

### 8. HOW IS YOUR PERSONAL DATA SECURED?

Spectris has taken adequate safeguards to protect the confidentiality, integrity, availability and security of your personal data. We regularly review our technical configurations and systems to enhance our information and cyber security. We have implemented appropriate technical,

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physical and organisational measures to protect systems that hold and process your personal data against accidental or unlawful destruction, accidental loss, damage, alteration, unauthorised disclosure or access and against all other forms of unlawful processing.

### 9. LINKS TO OTHER WEBSITES

Our Online Channels may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that **we do not have any control over the other websites**. Therefore, we cannot be responsible for the protection and privacy of any information that you provide while visiting such sites and such sites are not governed by this Privacy Notice. You should exercise caution and look at the privacy notice applicable to the website in question.

### 10. YOUR RIGHTS

You have a number of rights under applicable data protection law in respect of our processing of your personal data. These include:

- the right to request access to your personal data;
- the right to request rectification of any personal data that we hold;
- subject to certain conditions:
  - the right to request erasure of your personal data;
  - the right to request restriction of processing of your personal data;
  - the right to have your personal data transferred to another controller;
- where we rely on your consent for processing, the right to withdraw such consent; and
- the right to lodge a complaint with a data protection authority (in the UK, this is the Information Commissioner's Officer (ICO)). A list of other authorities can be found via this link: [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)

Should you wish to exercise your rights, you can send your request to the Spectris Group Privacy Counsel via [data.protection@spectris.com](mailto:data.protection@spectris.com). Note that for us to respond to your request, we may require you to verify your identity.

Please be aware that some (or all) of these rights may not be available to you in your jurisdiction. Furthermore, we may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).