

## PRIVACY POLICY

This Privacy Policy describes how we process personal data when using our website at [www.satoeurope.com](http://www.satoeurope.com).

### 1. What is personal data?

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Personal data is any type of information that relates to an identified or identifiable natural person. This can be data that is personal to you, such as your name, address, email addresses and behaviour as a user.

### 2. Data Controller and Data Protection Officer

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Pursuant to Art. 4 (7) General Data Protection Regulation (GDPR), the Data Controller is available at SATO UK Limited, Valley Road, Harwich, Essex CO12 4RR, United Kingdom. [enquiries-uk@sato-global.com](mailto:enquiries-uk@sato-global.com).

We have also appointed a Data Protection Officer. You can reach our Data Protection Officer under [gdpr-eu@sato-global.com](mailto:gdpr-eu@sato-global.com).

### 3. What data do we collect?

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Our website is intended primarily for informational use. Interested users can use it to find out about our company and our products and services. The data and information we collect can be divided into the following categories:

- **Automatically collected data:** When you access and use our website, we automatically collect information, including personal information on the technology you use, and information on how you use it and our website.
- **Log files and device information:** Log files contain data that your browser automatically sends to our web server. These log files contain information about:
  - Your IP address
  - Date and time of access
  - The URL requested (specific page)
  - Access status/HTTP status code
  - The volume of data transferred in each case
  - The website from where the request came (referring URL)
  - The browser type and browser language setting

These logs are primarily used for ensuring website delivery, functionality, and security.

- **Cookies/Beacons:** We use cookies and web beacons and also allow our business associates and partners to use these tracking technologies on our website. Cookies are tiny snippets of information your browser automatically stores in the main memory on your computer. Cookies contain different data, such as information on the pages viewed, the frequency of page views and actions you have taken on our website (such as you sharing our website with one of your social networks). Technical precautions are undertaken to pseudonymise this data thus making assignment of the data to a specific user impossible. Please refer to our Cookie Policy for more information on which cookies we use and how we use these technologies.

You may manage or withdraw your consent to non-essential cookies at any time via our Cookie Settings.

Web beacons are small, invisible graphics that are loaded by a server as soon as you visit one of our websites. This process is registered along with the visitor's IP address and allows your movements to be tracked on our website.

- **Third- Party Tracking and Analytics Tools:** We use a range of third-party services that place cookies or tracking tags on our behalf to help us improve the site, personalize content, manage marketing, and measure campaign effectiveness. These tools may collect information such as IP address, browser type, device characteristics, and user interaction. These tools include:
  - **Google** (Analytics 4, Google Ads Conversion Tracking, Google Tag, Remarketing, Consent Mode)
  - **Facebook** (Meta Pixel and domain verification)
  - **LinkedIn** (Insight Tag and conversions)
  - **Twitter** (Base Pixel)
  - **YouTube** (embedded video tracking)
  - **CookieYes** (consent management)
  - **Doofinder** (site search enhancement)
  - **Salesforce / Account Engagement** (marketing and lead management)
  - **Lead Forensics** (IP-based company identification)

These services may process information such as device type, IP address, browser version, and user interaction with our content.

Further information about these services and how we use them is provided in Sections 4 and 5 of this policy.

- **Data and information you provide:** If you contact us with general questions about our company or our products or write to us about technical problems you are having with our products, we store and process the personal data you submit with your enquiry/request. To contact us, please select one of the communication methods listed under "Contact". The "Contact" page also features a contact form for your use where we ask you to provide the information marked with an asterisk (\*). The information and data you provide us with beyond that is made at your discretion. We may also establish contact with you and ask you for additional data and information.

#### **4. How do we use the data you collect? On which legal basis is the data used?**

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We use, store and process information, including personal data on your person, for the following purposes and on the following legal basis:

- **Provision, improvement, enhancement and security of our website:** We use the log files that are automatically collected on your device in order to be able to provide you with the website and its functions in the first place. We also use this information and data to optimise our website and safeguard the security of our IT systems. Your IP address needs to be stored for the duration of the session for this purpose.

Tools we use include **Google Analytics 4, Doofinder, and Lead Forensics**. These services support these efforts by helping us identify popular pages, content relevance, and how users interact with our internal search functionalities. We use log files as part of our legitimate interest in ensuring the availability and enhancement of our website. The legal basis for the use of the log files is formed by legitimate interest (art. 6 (1) (f) GDPR) or where required, consent (art. 6(1) (a) GDPR).

**Analysis:** We use the information and data we generate through cookies to analyse how our website is used. As a result, we learn more about the number of visits to a page, user behaviour and the length of the visit, so that we can draw conclusions about which content on our website is of particular interest to visitors and which is less interesting. We may take this into account when making updates or redesigning our website in future.

We have a legitimate interest in analysing how our website is used. This is the only way we can find out whether and how our website attracts any interest at all. This allows us to better plan and use our resources. The legal basis for the use of cookies for analytical purposes is formed by Art. 6 (1) (f) GDPR.

Depending on the specific tool and applicable legal requirements, we may also process this data based either on your consent, in optimising the user experience and assessing website performance. Consent is managed through our cookie banner and settings interface. The legal basis for this processing is formed by Art. 6 (1)(a) GDPR.

- **Marketing and advertising:** We also use the data from cookies and web beacons for advertising purposes, for instance, to display advertising on our website or on third-party websites. This data can provide information on your movements on the Internet and which advertising you were particularly interested in because you clicked on it. This allows our advertisers to use their advertising in a much more targeted fashion and make recommendations based on your interests and preferences.

We use services such as:

- Google Ads Conversion Tracking
- Google Remarketing
- Meta Pixel (Facebook)
- LinkedIn Insight Tag
- Twitter Base Pixel
- YouTube API events
- Salesforce / Account Engagement
- Lead Forensics

We have a legitimate interest in using your information as part of our marketing and promotional activities, because we wish to offer you our products, or offer you those products that may be of interest to you. Furthermore, we can use the data obtained through the cookies to understand how efficient our advertising campaigns are, which helps us plan and budget our advertising. The legal basis for the use of cookies for analytical purposes is formed by legitimate interests (art. 6 (1) (f) GDPR) or consent where required (Art. 6(1)(a) GDPR).

- **Communication:** When you contact us (e.g. via our contact form or by email), we use the personal data you provide to respond to your enquiry as efficiently and appropriately as possible..

The use of your data within the context of communicating with you corresponds to our legitimate interest in accordance with Art. 6 (1) (f) GDPR. Insofar as it concerns a specific enquiry about our products, your data is used to execute a contract or execute pre-contractual measures at your request in accordance with Art. 6 (1) (b) GDPR.

## 5. Do you share my personal data and information with others?

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We work with various service providers to provide our website and for the purposes outlined above. This involves the following products that we have embedded into our website and about which we inform you now based on our current knowledge:

- **Google products:** We embed products from Google, LLC, 1600 Amphitheatre Pkwy, Mountain View, CA 94043, USA into our website. Google collects and stores data using cookies which are automatically stored on your computer (for more information on cookies, see above). The Google products we use are:
  - **Google Analytics:** We use the analytics service, Google Analytics, provided by Google for the aforementioned analytical purposes. Google Analytics is comprised of an analysis tool that provides us with information about how our website is used. We or Google use cookies on your computer for this purpose that record your behaviour on our website and transmit it to Google. Google uses this information to compile reports on how our website is used. Google may also transfer this information to third parties if required to do so by law, or where such third parties process the information on the behalf of Google.

We have enabled IP anonymisation for Google Analytics. Google truncates your IP address in the Member States of the European Union or other states that participate in the EEA before sending it to the Google servers in the United States. This makes it is untraceable. Only in exceptional cases is the complete IP address transferred to a Google server in the US and truncated there.

For further information on Google Analytics please go to: <http://www.google.com/intl/en/analytics/learn/privacy.html>.

- **Google Ads conversion:** Like most manufacturing companies, we use online advertising to try to promote our company and our products and to increase the amount of attention we receive from potential customers. Advertising thus comprises a high proportion of our costs. In order to minimise these

costs and make our advertising more efficient, we are extremely interested in finding out how successful our advertising campaigns are, and, in particular, whether the advertisements we have placed have led you to us, and if so, by which route.

The Google Ads conversion tool helps us do exactly that. If you are forwarded to our website by a Google ad that appeared in a Google search, Google Ads places a cookie on your computer. These cookies include the unique cookie ID, the number of ad impressions per placement (frequency), the last impression (relevant to post-view conversions) and the opt-out information (a flag showing that the user no longer wishes to be addressed). Google uses this data to prepare a statistical analysis, which we then analyse accordingly. We do not collect and process personally identifiable information in connection with the AdWords cookie and do not receive any further data.

We have no control over the scope and further use of the data collected by Google through the use of this tool. Google may collect and process your IP address and, if you are registered with a Google service, may associate your visit to our website with your account.

For more information on how conversion tracking works, please refer to: <https://support.google.com/adwords/answer/1722022?hl=de>

- **Google Remarketing.** This application allows us to redirect you to other websites as soon as you leave our website. This is performed by means of cookies stored in your browser, which record your usage behaviour when visiting various websites and is evaluated by Google. This is how Google determines that you previously visited our website. According to Google, the data collected during remarketing and your personal data, which Google may store, is not combined. According to Google, pseudonymisation is used specifically in remarketing.

For more information about Google Remarketing, please refer to: <https://support.google.com/adwords/answer/2453998?hl=en>.

- **Meta (Facebook):** We use the Meta Pixel to measure the effectiveness of Facebook ads and perform retargeting. Meta may associate this information with your Facebook account. Domain verification is also implemented to control data access. See: <https://www.facebook.com/about/privacy>.

- **LinkedIn:** We use the LinkedIn Insight Tag to track advertising effectiveness and learn about visitor demographics. Learn more: <https://www.linkedin.com/legal/privacy-policy>.
- **Twitter:** We use the Twitter Base Pixel to track how visitors interact with Twitter ad campaigns. See Twitter's privacy terms here: <https://twitter.com/en/privacy>
- **YouTube:** We embed videos from YouTube, which may set cookies and use API tags to track how users interact with the content. See: <https://policies.google.com/privacy>
- **CookieYes:** Used to manage user consent and provide cookie banners in line with EU and UK cookie law. See terms: <https://www.cookieyes.com/privacy-policy/>
- **Salesforce/ Account Engagement:** Provides email marketing, campaign tracking, and web form integration for lead generation. More info: <https://www.salesforce.com/company/privacy/>
- **Doofinder:** Improves website search functionality and logs anonymous user behavior during searches. For more: <https://www.doofinder.com/en/privacy-policy>
- **Lead Forensics:** Identifies company IP addresses to understand B2B website interactions. Each of these tools processes data in accordance with their own privacy policies. Where required, we obtain your consent before activating cookies or trackers. For more: <https://www.leadforensics.com/privacy-and-cookies/>

## 6. How long do you save my data for?

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We only retain the information you have provided us with for as long as it is necessary to fulfil the purpose for which you provided us with your data, or for compliance with legal regulations.

Log files that we use for the purpose of providing our website are automatically deleted as soon as the session ends. Log files for security purposes and as a precaution against attacks on our websites are automatically deleted after 7 days at the latest. The storage period for cookies varies according to the type of the cookie set and your browser settings.

Third-party tracking cookies have varying retention times based on the tool provider, cookie type, and your consent preferences. See our Cookie Policy for details.

## **7. Is data also transmitted to recipients outside the European Union or the European Economic Area (EEA)?**

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We share personal data with data processing companies based in non-EEA countries. In this case, before forwarding it, we ensure that the recipient either provides an adequate level of data protection (e.g. based on an EU Commission adequacy resolution for that particular country, self-certification by the recipient under the EU-US Privacy Shield or by agreeing what are referred to as EU standard contractual clauses for the European Union with the recipient) or adequate consent.

You can obtain an overview of the recipients in third countries and a copy of the specific arrangements agreed to ensure the appropriate level of data protection. Please use the details provided on the Contact page for this purpose.

## **8. Which rights do I have?**

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You have the following rights under the GDPR:

- Right to access your data
- Right to rectification
- Right to deletion
- Right to data portability
- Right to object to processing

If our legitimate interests justify data processing, you are entitled to object to data processing for the future, unless the data is absolutely necessary for operating the website (in particular for log files).

**Objecting to analytics and marketing tracking:** You may object or withdraw your consent to the use of Google, Meta, LinkedIn, Twitter, Salesforce, Lead Forensics, and other tools by:

- By setting your browser to reject cookies. Suppressing third-party cookies specifically results in you not receiving third-party ads. However, we would like to point out that this may limit your ability to use all of the features on our website to the full.
- Managing your preferences through our Cookie Settings.
- Using opt-out tools provided by each service:



- For Google Analytics;, you can download and install the browser add-on that Google offers using the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>. To prevent Google exploiting their interest in displaying user or interest-based advertising you can download and install the browser add-on provided by Google under the following link: <http://www.google.com/settings/ads/plugin>. Hotjar Opt-Out: <https://www.hotjar.com/opt-out>
- By disabling interest-based ads from providers that are part of the About Ads self-regulatory campaign under the link <http://www.aboutads.info/choices>, whereby this setting will be deleted when you delete your cookies.

**Your right to appeal to a supervisory authority:** Without prejudice to the rights set out above, you are entitled to complain to a supervisory authority, in particular in the member state where your place of residence or employment is located or where the alleged infringement took place, if you believe that processing your personal data violates the GDPR.

The supervisory authority to which the complaint is submitted will inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

## 9. Contact

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Both we and our Data Protection Officer will be glad to help if you require any information and suggestions on data protection. Please contact [gdpr-eu@sato-global.com](mailto:gdpr-eu@sato-global.com) in relation.

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