

Group Privacy Policy

Personal data at Camira

This Policy explains in general terms how Camira Group Limited and its subsidiaries ('Camira') processes and protects your personal data and protects your rights. It applies to personal data collected through Camira's digital platforms such as its website or social media accounts, or personal data collected in person such as during phone conversations or at Camira's offices and manufacturing sites.

Camira processes personal data in accordance with its own policies and with currently applicable data protection legislation. In some cases, Camira provides additional privacy notices specific to data processing activities. The terms of additional privacy notices are to be read in conjunction with this Group Privacy Policy.

This Policy only applies to personal data collected by Camira, whether collected via Camira owned digital assets or via third-party assets. Camira's Group Privacy Policy does not apply to how third parties define personal data or how they use it. Camira encourages you to read any applicable third-party privacy policies and understand your rights before interacting with them.

Camira Group

Headquartered and primarily based in the United Kingdom, Camira Group Limited leads a global group of companies providing textile products into a variety of commercial sectors. Those Camira companies included within the scope of this Group Privacy Notice are listed below.

UK based subsidiaries

Camira Fabrics Limited; Camira Transport Fabrics Limited; Camira Yarns Limited; and Holmfirth Dyers Limited.

Non-UK based subsidiaries

Camira Fabrics GmbH; UAB Camira Fabrics; Camira Fabrics (Shanghai) Limited; Camira Group, Inc; Camira Group Pty Ltd; Luna Textiles, Inc; and Camira Fabrics Turkey Tekstil Limited Şirketi.



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Personal data that Camira processes

Camira collects personal data from various sources, including directly, for example from a customer placing an order, and indirectly, for example from an agency, and from publicly accessible sources.

'Personal data' means any data, directly or indirectly relating to an identified or identifiable natural living person (a 'data subject'). Examples of categories of data subjects are given below.

Categories of data subjects whose personal data is processed by Camira include those relating to its employees, contractors, agency staff and other workers, recruitment candidates, prospects, customers, agents and distributors, suppliers, website users, visitors and contacts.

Categories of personal data processed include those relating to identification, address, contact, financial, employment, affiliation, relational, assets, knowledge, educational, behavioural, events, historical, inherent, medical, geographical, documentary, status, communications, monitoring, usage, image and data that is publicly available.

In limited circumstances and to the extent permissible in law, Camira may also collect and process special categories of personal data (sensitive personal data), including data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, sex life or sexual orientation for reasons including managing health, safety, welfare and wellbeing, managing attendance, administering payroll and benefits and monitoring and reporting on equal opportunities.

Camira processes personal data relating to criminal convictions and offences or related security measures only under the control of an official authority or to the extent permissible in law.

Camira does not engage directly with children, or proactively collect their data. However, occasionally Camira may be provided with personal data belonging to a child, for example by an employee acting in their capacity as a parent or guardian. The information in this Privacy Notice applies to children as well as adults.

Consequences of not providing data

Where the provision of personal data by you is a statutory and/or a contractual requirement, including a requirement necessary to enter into a contract, you are required to provide that personal data; failure to do so may result in adverse consequences including, where and insofar as applicable, disciplinary and/or legal proceedings.

How Camira processes personal data

Purposes

Camira processes personal data for reasons relating to planning, managing resources; developing, manufacturing and testing products; generating stock; managing supply chain; selling products; engaging with customers, pricing, marketing, managing orders, meeting compliance requirements; developing strategy and processes; managing finances and assets; engaging, developing and rewarding employees; monitoring and improving performance.

Data sharing and transfer

Camira may share your personal data internally within Camira, and externally. Categories of recipients include those within Camira and its customers, suppliers, contractors and agents providing services on its behalf including suppliers, agencies, occupational health providers, welfare providers, pensions and benefits providers, information technology vendors, waste collection providers, regulators, law enforcement and emergency services.

If Camira should ever merge with, be acquired by, or acquire another organisation, file for bankruptcy, or dispose of its assets, Camira may transfer your personal data to third parties, and/or share your information with an organisation with which Camira enters into such transaction or process, as a part of such transaction or process.

Camira does not share nor transfer personal data in exchange for any monetary or any other valuable consideration.

Further processing

Where Camira intends to further process personal data for a purpose other than that for which the personal data were collected, Camira will revise and reissue this Policy, and/or any relevant Privacy Notice(s), accordingly, including appropriate consideration of that further processing, in accordance with Camira's Data Protection Policy.

Providing your consent

In limited circumstances, Camira may seek consent to process your personal data. Such consent is not a condition of any contract of employment or contract to provide services. Where processing relies on such consent, you can exercise your right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Retention of your personal data

Camira's policy is to retain personal data only for as long as necessary for its purpose. Periods for which categories of personal data will be stored, or if that is not practicable, criteria used to determine such periods, are determined by respective categories of personal data in accordance with Camira's Retention Policy and can be conveyed via Privacy Notices.

Additional notices for residents of UK & EU/EEA

Accountability

In relation to the processing of personal data, Camira operates as a 'Data Controller' which means that Camira, alone or jointly with others, determines the purposes and means of the processing and also as a 'Data Processor' which means that Camira processes personal data on behalf of a Data Controller.

Lawful basis for processing

Camira's lawful basis for processing personal data can include circumstances in which processing is necessary for compliance with a legal obligation, for the performance of contract (or in order to take steps at your request prior to entering into contract), in order to protect your vital interests or of another individual, for the performance of a task carried out in the public interest or in the exercise of official authority vested in Camira, for the purposes of the legitimate interests pursued by Camira or by a third party, or with consent to the processing for specific purposes.

Camira's lawful basis for processing sensitive personal data can include circumstances in which processing is necessary, where and insofar as permissible in law, for the purposes of carrying out the obligations and exercising Camira's or your rights in the field of employment and social security and social protection, for the purposes of preventive or occupational medicine and/or for the assessment of working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services for the establishment, exercise or defence of legal claims, where personal data is manifestly made public by you, in the public interest, with your explicit written consent, or to protect your vital interests or of another individual where the data subject is physically or legally incapable of giving consent.

Legitimate interests

If, and to the extent that, Camira decides to process data based on its 'legitimate interests', Camira will issue Privacy Notice(s) in respect of such processing, including explanation of these legitimate interests, in accordance with Camira's Data Protection Policy.

International transfer

If, and to the extent that, Camira decides to transfer personal data outside the EU or to international organisations, Camira will issue Privacy Notice(s) in respect of such processing, including explanation of appropriate safeguards, in accordance with Camira's Data Protection Policy.

Automated decision-making

If, and to the extent that, Camira decides to use your personal data for automated decision-making, including profiling, Camira will issue Privacy Notice(s) in respect of such processing, including explanation of the automated decision-making, and including meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing to you.

Data accuracy

Camira takes reasonable steps to ensure that personal data are accurate and, where necessary, kept up to date, and that inaccurate personal data, considering the purposes of the processing, are erased or rectified without undue delay. All those working under Camira's control are required to keep Camira informed of changes to their personal data without undue delay.

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Rights

You are entitled to exercise your rights relating to your personal data, including access to, and rectification or erasure of personal data, or restriction of processing concerning you or to object to processing, as well as the right to data portability, in accordance with Camira's Data Protection Policy. Such requests must be addressed to Camira's Data Governance Team. These requests are normally free of charge, however Camira may charge a reasonable fee if a request for access is clearly unfounded or excessive, or alternatively, may refuse to comply with the request.

Data breach

In the event of a personal data breach, Camira will notify you, other data subjects and the relevant supervisory authority, where and insofar as required, in accordance with Camira's Data Protection Policy.

Complaints

Complaints relating to Camira's processing of personal data can be addressed to Camira's Data Governance Team at datagovernance@camirafabrics.com. A complaint may also be lodged with the relevant supervisory authority. Camira has determined its Lead Supervisory Authority as the UK Information Commissioner's Office at www.ico.org.uk.

Additional notices for residents of California

General

This California Consumer Privacy Act (CCPA) specific privacy notice supplements the information and disclosures already contained in Camira Group Privacy Policy. This notice applies to individuals residing in California from whom Camira actively or passively collect personal data.

All references to 'data subject' are to be interpreted as to also include 'Consumer', which is defined as 'a natural person who is a California resident' in Section 17014 of Title 18 of the California Code of Regulations.

Personal Data Collection Notice

Camira processes personal data in accordance with this Group Privacy Policy. Categories of personal data as defined by the CCPA collected by Camira generally, and specifically during the previous 12 months include identifiers; commercial information; geolocation data; professional or employment related data; and associated inferences drawn from any of the personal data collected.

Camira has processed these categories of personal data for business purposes. 'Business purpose' as defined in the CCPA and applicable to Camira includes: auditing related to a current interaction with a data subject and concurrent transactions, including, but not limited to auditing compliance with CCPA and other requirements; detecting security incidents, protecting against malicious, deceptive, fraudulent, or unlawful activity, and prosecuting those responsible for that activity; debugging to identify and repair errors that impair existing intended functionality; short-term, transient use; contracting with service providers to perform services on Camira's behalf; undertaking internal research for technological development and demonstration; undertaking activities to verify or maintain the quality or safety of Camira's products or services, and to improve, upgrade, or enhance those products or services; otherwise enabling or effecting, directly or indirectly, a commercial transaction; and for other purposes for which Camira will provide specific notice at the time the information is collected.

Camira does not sell, rent, release, disclose, disseminate, make available, transfer, or otherwise communicate orally, in writing, or by electronic or other means, any data subject's personal data to another business or a third party for monetary or other valuable consideration.

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Rights

You are entitled to exercise your rights relating to your personal data, including disclosure of the categories of type of personal data, source and purpose of collection, third parties in receipt of shared personal data, and specific pieces of personal data collected relating to you, and the access to, and deletion of, that personal data. Camira will not discriminate against those exercising these rights.

Personal data collected for the purpose of actioning an opt-out request, will only be used for that purpose. Requests to opt-out of marketing communications will be upheld, insofar as is possible in consideration of technological and behavioural constraints. It may not be possible to guarantee that you will not be asked to opt-out again if you change your web browser, clear the cache of your existing browser or use a different device. Third-parties nominated and authorised by you may opt-out on your behalf.

Exercising your rights and making complaints

If you want to exercise your data subject rights or make a complaint relating to Camira's processing of personal data, contact Camira's Data Governance Team at datagovernance@camirafabrics.com.

Under California Civil Code Section 1789.3, California website users are entitled to the following specific consumer rights notice: The Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs may be contacted in writing at 400 R Street, Suite 1080, Sacramento, California 95814, or by telephone at (916) 445-1254 or (800) 952-5210.

Further information and contacts

Further information about Camira's processing of personal data is available on Camira's intranet or at www.camirafabrics.com. Camira's Data Governance Team is contactable at DataGovernance@camirafabrics.com or at The Watermill, Wheatley Park, Mirfield, WF14 8HE, United Kingdom.

Camira may revise and reissue this Group Privacy Policy from time to time. Camira may also communicate in other ways about the processing of data subjects' personal data, including via Privacy Notices, in accordance with this Group Privacy Policy and with Camira's Data Protection Policy.



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ANTHONY CROALL

Commercial Director

Dated: October 2021

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