



**Oxbow UK Limited**  
**Privacy Policy – United Kingdom**  
**Effective as of October 1, 2023**

## 1. Introduction & Scope

We know that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This Privacy Policy (“Policy”) describes how Oxbow UK Limited and its affiliates (collectively “Oxbow”) collect and process information relating to individuals, which we refer to as “personal data,” when you visit Oxbow websites that contain a link to this Policy, including OxbowUK.com, or otherwise interact with Oxbow to receive products or services (together “Oxbow Services”).

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Oxbow UK Limited and/or its affiliated entities are responsible for the processing of your personal data as described in this Policy, and act as the controller of such personal data.

This Policy does not apply to the practices of third parties (including service providers) who may also collect or receive data in connection with your use of Oxbow Services. For example, your payments through our website are powered by PayPal and therefore the PayPal Privacy Policy would apply to any transactions involving payments. See <https://www.paypal.com/uk/legalhub/privacy-full> for more information.

## 2. What Personal Data About You Does Oxbow Collect?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which may include:

- Identity Data, such as name, user name, or similar identifier
- Commercial Data, such as purchases or order information and history
- Contact Data, such as addresses, telephone numbers and e-mail address
- Financial Data, such payment card and bank details
- Technical Data, such as login data and other technology on the devices you may use to access this website
- Usage Data, such as information about how you use our website, products, and services



- Marketing and Communications Data, such as your preferences in receiving marketing from us
- Any other personal data contained in information you provide to us in relation to Oxbow Services

### 3. What are the Sources of Personal Data Oxbow Collects?

We use different methods to collect data from and about you including through:

- **Direct and Indirect Interactions:** We receive and store personal data you provide in relation to Oxbow Services. For example, when you make a purchase from our website, we may ask you to provide us with information about your purchase such as your name, e-mail address, billing address, shipping address, and phone number.
- **Automatic Information:** We automatically collect and store certain types of information about your use of Oxbow Services, including information about your interaction with content and services available through Oxbow Services. Like many websites, we may use “cookies” or other unique identifiers, and we obtain certain types of information when your web browser or device accesses Oxbow Services. See Section 5 for more information about cookies.
- **Third Parties:** We might receive information about you from various third-party sources. For example:
  - When you make a purchase from our website, your payment is processed through a third-party service provider (PayPal UK based inside the UK) who may provide us with information about your purchase such as Identity, Contact, Financial, and Commercial Data.
  - We may receive updated Contact Data from our shipping carriers (based inside the UK), which we may use to correct our records and deliver your next purchase more easily.

### 4. For What Purposes Does Oxbow Use Your Personal Data and Under Which Legal Bases?

We will only use your personal data when the law allows us to. We use your personal data for various purposes, examples of which are detailed in the table below, along with the legal bases we may rely on to do so. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order / services	(a) Identity (b) Contact (c) Commercial (d) Financial (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)



To communicate and manage our relationship with you	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration, auditing, and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

## 5. What about Cookies?

When you visit our website, the site asks your browser to store a small piece of data (text file) called a cookie on your device in order to recognize your browser or device and to provide Oxbow Services. Oxbow uses only cookies that are strictly necessary for the functionality of our website and these cookies cannot be switched off in our systems. You can set your browser to block or alert you about these cookies but blocking them will cause some parts of the website to become inoperable for you. Each of these cookies are removed at the end of each session. More information about the individual cookies we use is below.

Cookie Name	Purpose (All are required for operation of the OxbowUK.com website)
ARRAffinitySameSite	This encrypted cookie is required by Microsoft Azure to direct an individual user's requests to the appropriate UK-based Azure Cloud.
ARRAffinity	This encrypted cookie serves the same purpose as ARRAffinitySameSite, but only for legacy web browsers.
ECommApp	This cookie is encrypted by Oxbow with a private key. It is used to link a user's browser to their OxbowUK.com account.
AspNetCore.AntiForgery.9fXoN5jHCXs	This cookie is encrypted by Oxbow with a private key. It prevents a user from impersonating another user.



AspNetCore.Mvc.CookieTempDataProvider	This cookie is encrypted by Oxbow with a private key. It allows for internal transmission of small strings of text, none of which contains personal data.
CartCookieFilter	This cookie is encrypted by Oxbow with a private key. It allows for storage of a non-logged in user's postal code for pricing retrieval.
CartCookie	This cookie is encrypted by Oxbow with a private key. It allows for storage of a user's shopping cart items when the user is not logged in.

## 6. Does Oxbow Share Your Personal Data?

Information about our customers is an important part of our business. We require all third parties with whom we share your personal data to respect its security and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. The purposes and third parties with whom we may share your personal data are:

- **Oxbow-Affiliated Companies:** We share personal data with other companies in the Oxbow Group, who will act as joint controllers or processors when dealing with any such data. This is to administer our business, for example to conduct leadership reporting, executive decision-making, and provision of shared services, including information technology and system administration services.
- **Third-Party Service Providers:** We employ other companies and individuals to perform functions on our behalf. Examples include processing payments and delivering packages.
- **Business Transfers:** As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing privacy policy (unless, of course, the customer consents otherwise).
- **Protection of Oxbow and Others:** We release account information and other personal data when we believe release is appropriate to comply with the law; enforce or apply our Consumer Terms and Conditions and other agreements; or protect the rights, property, or safety of Oxbow, our users, or others. This may include exchanging information with other companies and organizations for fraud protection.

## 7. International Operations and Transfers Out of the United Kingdom

Your personal data may be collected, used, processed, stored, or disclosed by us and our third-party service providers outside your home jurisdiction, including in the United States of America where Oxbow is headquartered.

These transfers are made in accordance with applicable data protection laws, and where there is adequate protection in place for the data.

For transfers of personal data from the UK to Oxbow entities or third-party service providers outside the UK, we primarily enter into data processing agreements with the receiving party that include the UK Information Commissioner's Office-approved standard contractual clauses. These agreements require



that the recipient use the personal data only as instructed by the data controller or exporter, that they respect the confidentiality of your personal data and that they have appropriate data security measures in place in accordance with applicable data protection laws.

In certain limited circumstances, Oxbow may rely on derogations defined in the UK GDPR Article 49 for specific transfers of personal data to countries outside the UK.

## 8. How Secure is Information About Me?

We design our systems with your security and privacy in mind.

- We work to protect the security of your personal data during transmission by using encryption protocols and software.
- We maintain appropriate physical, technical, and organisational safeguards in connection with the collection, processing, storage, and disclosure of your personal data.
- It is important for you to protect against unauthorized access to your password and to your computers, devices, and applications.

We may retain your personal data for a period of time consistent with the original purpose of collection (see Section 4 above) or as long as required to fulfill our legal obligations. We determine the appropriate retention period for personal data on the basis of the amount, nature, and sensitivity of the personal data being processed, the potential risk of harm from unauthorized use or disclosure of the personal data, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiry of the applicable retention periods, your personal data will be deleted.

## 9. Your Rights and Choices

In addition to your right to be informed via this Policy, you also have the following rights:

- **Rights of access and correction/rectification.** You have the right, upon request, to access and obtain a copy of the data we hold on you and to require us to change incorrect or incomplete data.
- **Right to withdraw consent.** If we have collected and processed your personal data based on your consent, you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we carried out prior to your withdrawal, nor will it affect processing of your personal data carried out in reliance on lawful grounds other than consent.
- **Rights to restrict processing and erasure.** You have the right to request restriction of processing of your personal data and to request deletion of your personal data under certain circumstances (for example, if you believe the data is inaccurate, is no longer necessary for the purposes of processing, or if you believe we processed your data unlawfully).
- **Right to object.** You have the right to object to processing if you have reason to believe your data protection rights have been infringed by us.
- **Right to data portability.** You have the right to request that we transfer the personal data that we have collected regarding you to another organization, or directly to you, under certain



conditions.

If you would like to exercise any of these rights, please contact [privacy@oxbow.com](mailto:privacy@oxbow.com) with “UK GDPR Request” in the subject line and identify your specific request in the body of the message. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we process personal data.
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

## 10. Changes to Our Privacy Policy

We will update this Policy from time to time to reflect changes in our practices, technologies, legal requirements, and other factors. If we do, we will update the “effective date” at the top. If we make a material update, we may provide you with notice prior to the update’s taking effect, such as by posting a notice on our website or by contacting you directly, or where required under applicable law and feasible, seek your consent to these changes.

We encourage you to periodically review this Policy to stay informed about our collection, processing and sharing of your personal data.

## 11. How to Contact Us

If you have any questions or comments about this Policy, please do not hesitate to contact us at [privacy@oxbow.com](mailto:privacy@oxbow.com).

Oxbow UK Limited

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If you feel we have not addressed your concern in a satisfactory manner or should you otherwise wish to report a complaint, you have the right to lodge a complaint with the UK Information Commissioner’s Office: <https://ico.org.uk/for-the-public>.