

# Privacy policy

Last updated: 27 October 2023

## 1. INTRODUCTION AND DATA CONTROLLER

### 1.1. Data controller

Steelcase Holding Limited (the “Company”, “we”, “us” or “our”), a private limited company, whose registered office is located at 77-79 Farringdon Road, London, England,, registered as a private limited company under No. 01 39 57 50, acts as the data controller of the information that we may collect from you or that you may communicate to us when you visit <https://uk.steelcase.com/> (our “Website”).

This policy may be subject to change from time to time, as indicated below under clause 8 “Changes to our Privacy policy”. Your continued use of the Website following the implementation of any changes will constitute your acceptance of those changes.

### 1.2. Important information

This policy applies only to the information we collect on the Website and in e-mails and other electronic messages exchanged between you and us. It does not apply to information that we collect offline or by any other means, including on any other website operated by us or third parties (including our affiliates), that may be redirected to or accessible from the Website.

### 1.3. Children’s Privacy

Our Website is not intended to deliberately collect personal data from children.

If you are under the age of 16, please do not use or provide information on the Website or on or through any of its features. If we discover that we have collected or are seen to collect personal data from a child under the age of 16 without parental consent, we will delete such information.

### 1.4. Hypertext Links

The Website may include links to websites published by third parties. By clicking on such links, third parties may collect or share information about you. We have no control over third party websites, and we have no responsibility or liability for the manner in which they may treat your personal information. When you leave the

Website, we recommend that you review the Privacy policy of each website you visit.

## **2. PURPOSES AND LEGAL BASIS OF THE PROCESSING**

We may need to process some of your personal data in order to:

- provide our services, sell products and ensure the management and follow-up of customer relations. The data processing which is here taking place is based on several legal basis: Legitimate interest in conducting Steelcase business, Performing our contracts, Compliance with a legal or statutory obligation to which we are subject, Establishment, exercise, or defense of legal claims, Protection of vital interests, and Consent.

## **3. PERSONAL DATA COLLECTED**

We may collect several types of information from and about users of the Website, including the following information:

- (a) Identifying information that allows us to identify you personally and that you voluntarily provide, such as your name, postal address, e-mail address, telephone number or any other information that can be used to identify, locate or contact you online or offline;
- (b) Information related to your orders and payments; and/or
- (c) Technical, usage and marketing data relating to your Internet connection, the equipment you use to access the Website and usage information for the purpose of improving your access to and use of the Website.

We collect such information:

- (a) directly from you when you provide it to us; and/or
- (b) automatically when you visit the Website, including Website usage information, IP addresses and information collected through cookies.

## 4. YOUR RIGHT

You have the right:

- to request access to your personal data, their correction, their deletion as well as the limitation of their treatment;
- when the processing is based on the execution of the contract, to request the portability of your data;
- to send specific instructions regarding the use of your personal data after your death;
- to object at any time to the processing of your personal data (i) for reasons relating to your particular situation, when such processing is based on the pursuit of our legitimate interests; or (ii) for the purposes of canvassing, including profiling to the extent that it is related to such canvassing.

To exercise these rights, you may contact us via the following e-mail address: [privacy@steelcase.com](mailto:privacy@steelcase.com), indicating your first and last names and providing proof of your identity. In accordance with the applicable regulation, we may refuse to grant the request if it is manifestly unfounded or excessive.

You also have the possibility of filing a complaint to the Information Commissioner's Office (ICO) <https://www.ico.org.uk>, the supervisory authority responsible for the protection of personal data.

## 5. RECIPIENTS OF YOUR DATA

We only communicate your personal data to authorized and determined recipients to meet the purposes previously indicated. These include in particular:

- (a) persons in charge of sales, finance, customer relations, logistics and IT services.
- (b) our subsidiaries and affiliates; and
- (c) our service providers and other third parties that we use to provide our services and who are contractually bound to maintain the confidentiality of personal data and to use it only for the purposes for which we disclose it to them.

We may also disclose your personal data:

- (a) to comply with any legal obligation, request or legal process, including to respond to any governmental or regulatory request; and

(b) to enforce our Use terms and our Sale terms and conditions.

## **6. DATA TRANSFER OUTSIDE THE UK AND EUROPEAN ECONOMIC AREA**

Because the Company is a wholly-owned subsidiary of the Steelcase Group, with its ultimate parent company located in the United States, and given the international nature of our business and the centralized nature of certain Steelcase Group activities, your personal data may be stored and processed at various levels (e.g., global, regional and/or local) where the Steelcase Group has facilities, including outside the UK and European Economic Area.

To ensure adequate protection of personal data transfers outside the UK and European Economic Area, the Company and its affiliates, subsidiaries or service providers have implemented Standard Contract Clauses for the Transfer of Personal Data to Third Countries (“Standard Contracts”), in accordance with European Commission Decision 2004/915/EC of December 27, 2004. You may obtain a copy of these Standard Contracts by contacting us at the following e-mail address: [privacy@steelcase.com](mailto:privacy@steelcase.com).

Also information submitted by users to the Website will be transmitted to and shared with third parties that may be located in other countries, in order to provide services to such users, including but not limited to transaction processing and fraud prevention.

## **7. DATA RETENTION PERIOD**

The personal data processed by the Company is kept for a period not exceeding the time necessary to provide our services and to manage and monitor the relationship with our customers and prospects. Certain personal data may be retained by way of archiving beyond this period in order to enable us to establish proof of the contract or of the fulfillment of our obligations within the legal prescription periods.

## **8. CHANGES TO OUR PRIVACY POLICY**

Our practice is to post any changes to our Privacy policy on this page.

If we substantially change the way we treat our users’ personal data, we will notify you by e-mail via the e-mail address in your account, and/or by a notice published on the home page of the Website.

The date of last revision of the Privacy policy is indicated at the top of the page.

## 9. CONTACT INFORMATION

If you have any questions or comments about this Privacy policy or our data privacy practices, and/or if you wish to exercise your rights, please contact us via the following e-mail address: [privacy@steelcase.com](mailto:privacy@steelcase.com).