



Rosebank Industries plc (collectively referred to as "Rosebank", "we", "us" or "our" in this Privacy Policy) is committed to protecting the privacy of the personal data that is provided to us or collected by us during the course of our business.

Rosebank is the controller and responsible for any personal data provided to us, as described in this Privacy Policy, for the purposes of the UK data protection laws. See our "how to contact us" section for our full contact details.

The scope of this Privacy Policy

This Privacy Policy applies in the following circumstances:

1. when you visit the website hosted at www.rosebankindustries.com (the "website");
2. when you contact us by email or telephone using the contact details we make available on the website; or
3. if you are a Rosebank shareholder or business contact.

The Information we collect about you

This section explains how we collect personal data about you, the types of personal data we may collect, how we may use it, who we may share it with and how long we will keep it for:

1. Visitors to our website

Standard cookies are used on this site to monitor the flow of traffic. The information provided by cookies will include the date and time of visit to the site, the pages visited, the name of the user's internet service provider and where appropriate the website that referred the user. Such details are used for analytical purposes only. Users of the site have the opportunity to set their computers to either accept all cookies, to notify the user when a cookie is set, or to not receive any cookies at any time. If the user allows cookies to be used on their computer it does not give Rosebank access to the computer being used and as such Rosebank will not use cookies to track online activity once a user leaves this site. From time to time Rosebank and/or its website service provider may share statistical data about site user traffic patterns with other parties. Such information does not involve the sharing of information about individual users.

2. People who contact us by email or telephone using the contact details on the website

If you contact us by email, we will collect your name, email address, the subject of your enquiry and any personal data contained in the message section of your enquiry. We will use this personal data to consider and respond to your enquiry.

If you contact us by telephone, we may collect your name, contact details (such as telephone number or email address), the subject of your enquiry and any other personal data that you provide to us that is relevant to your enquiry. We will use this personal data to consider and respond to your enquiry.

If you are contacting us in respect of media relations, we will use your personal data to consider and respond to your enquiry and this information will be passed to our external media relations advisor for this purpose.



We process this personal data on the basis of our legitimate interest of dealing with your enquiry. Depending on the subject of your enquiry, it may also be necessary for us to use your personal data to comply with a legal obligation relating to how we manage our business or our relationship with you.

We will keep our copy of your personal data held for this purpose until the discussion of the subject matter of your enquiry has come to an end and we no longer need to comply with a legal obligation that requires us to retain this personal data. We will delete our copy of this personal data 24 months from the end of our discussions with you although we may retain a record of the existence of the enquiry, to the extent and for so long as we are required to do so by law.

3. Shareholders

If you are a shareholder, we process your name and contact details (including address), the number of shares you hold, details of the votes you cast and your shareholder reference number. We use your personal information to manage your shareholding, to enable you to exercise your shareholder rights, to keep our shareholder register up to date and to contact you. We obtain this information either from you or our appointed Registrar, Equiniti Limited, and share this information with Equiniti Limited. We process this information on the basis of complying with a legal obligation, and our legitimate interests in managing our relationship with you or managing your shareholding.

4. Other business contacts

If you work for an organisation that we do business with or receive services from, we will process your name, details about your employer, your job title and contact details. We obtain this information either from you, from your employer or from publicly available sources such as your organisation's website. We will use this information on the basis of legitimate interests in managing our business relationships. We will keep this information for 24 months since our last contact with you.

5. Visitors to our offices

If you visit our offices, we will use information relating to you that you give us or we otherwise obtain when you visit us (for example, if you sign in or are recorded on CCTV while visiting us, or you give us the registration details of your vehicle). We process this information on the basis of our legitimate interests in keeping our offices secure. We only keep this information for 12 months after your visit.

6. Disclosures of your personal data

- We will share your personal data with certain third parties. If you are contacting us in respect of media relations, your personal data will be passed to our external media relations advisor to use for the purpose of dealing with your enquiry. We will also share your personal data with:
 - Any member of our group, which includes our subsidiaries who support our processing of personal data under this policy;



- As mentioned above, if you are a shareholder we will share your information with our appointed Registrar, Equiniti Limited;
- Our business partners, suppliers and sub-contractors for the performance of any contract we enter into or other dealings we have in the normal course of business;
- Our IT service providers, including analytics and search engine providers that assist us in the improvement and optimisation of our website; and
- Our auditors, legal advisors and other professional advisors or service providers.

We require all such third parties to respect the security of your personal data 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.

Other disclosures we may make

- We will disclose your personal information to third parties:
 - In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets subject to the terms of this privacy policy.
 - If Rosebank or substantially all of its assets are acquired by a third party, in which case personal data held by it will be one of the transferred assets.
 - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

Transfers outside the United Kingdom or the European Economic Area

We may transfer your personal information outside the United Kingdom ("UK") or the European Economic Area ("EEA"):

- In order to store it.
- Where we are legally required to do so.
- In order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

We may transfer your personal information to the US.

Where your information is transferred outside the UK or the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism, and that it is treated securely and in accordance with this privacy policy.

7. Your rights

Under certain circumstances, you have rights under UK Data Protection Law in relation to your personal data that we process within the scope of this Privacy Policy. These rights are:



1. To request access to your personal data;
2. To ask for your personal data to be rectified where that personal data is inaccurate;
3. To ask for your personal data to be erased;
4. To restrict or object to the processing of your personal data by asking for the processing of that personal data to be restricted or stopped;
5. To request that your provided personal data be moved to a third party; and
6. To withdraw your consent to the processing of your personal data at any time, where our processing is based on your consent.

To exercise any of these rights, please contact us by writing to us at Rosebank, Highdown House, Yeoman Way, Worthing, BN99 3HH.

You also have the right to make a complaint to the UK Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk), about the manner in which we process your personal data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

8. How to contact us

For any enquiries relating to this Privacy Policy or how we use information collected from the website, please contact us by writing to us at Rosebank, Highdown House, Yeoman Way, Worthing, BN99 3HH.

9. Changes to this Privacy Policy

We may make changes to this Privacy Policy at any time without notice to you. Any changes we make to this Privacy Policy in the future will be posted on this page and will be immediately effective upon the posting of the updated Privacy Policy unless we indicate a particular date on which it will be effective. However, where we change our Privacy Policy to reflect a new way we may use personal data which we have not told you about before, we will not use your personal data collected before that change, unless we notify you in advance.

10. Data Security

Rosebank takes appropriate measures to protect personal data against unauthorised access, loss, or misuse. Access to personal data is limited to authorised employees, contractors, and third parties who have a legitimate business need and are bound by confidentiality and data protection obligations. We will notify affected individuals promptly in the event of a data breach.