

GANTRADE
Privacy & Cookies Policy

[Updated and effective as of 25 May 2018.]

TOPICS

This Privacy Policy is divided into the following sections:

[About Us](#)

[Contacting Us](#)

[Data protection principles](#)

[Personal information we collect](#)

[How we collect your personal data](#)

[How we use your personal information](#)

[Disclosure of your personal information to third parties](#)

[International transfers](#)

[Security of your personal information](#)

[How long we keep your personal information](#)

[Access to and updating your personal information](#)

[Right to object](#)

[Your other rights](#)

[Exercising your rights](#)

[Cookies](#)

[Links](#)

[Complaints](#)

[Changes to our Privacy Policy](#)

At Gantrade, we are committed to respecting your privacy. This Privacy Policy explains how we collect, use and disclose personal information that we receive when you visit this website, use our services, or communicate with us, both on this website and offline, as a business customer, prospective customer or general contact.

It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your data.

This Privacy Policy does not apply to our employee personal data or candidate recruiting practices. Please refer to other privacy notices pertaining to those activities.

ABOUT US

This Privacy Policy is issued on behalf of the Gantrade group of companies (“**Gantrade**”).

Gantrade is an international leader in petrochemical manufacturing and marketing having its parent company in Montvale, NJ USA. Gantrade is made up of different legal entities, details of which can be found on this website.

When Gantrade processes your personal information it is responsible as ‘controller’ of that personal information for the purposes of data protection laws including, where applicable, the EU General Data Protection Regulation (“**GDPR**”).

CONTACTING US

If you have any queries in relation to this Privacy Policy, or to exercise any of your rights as described in this Privacy Policy or under data protection laws, you can contact us as follows:

Gantrade Corporation

210 Summit Avenue
Montvale, NJ, 07645 USA
Tel: +1 201-573-1955

Gantrade Europe Limited

Birch House, Fairfield Avenue
Staines upon Thames, Middlesex
TW18 4AB
United Kingdom
Tel: +44 (1279) 755 775

Gantrade China

802 Dalian Asia Pacific Finance Center
55 Renmin Road
Dalian, 116001 China
Tel: +86 (411) 8253 5551

By email:
info@gantrade.com

PERSONAL INFORMATION WE COLLECT

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

- Identity Data - includes first name, last name, username or similar identifier, title, date of birth and gender.
- Contact Data - includes billing address, delivery address, email address and telephone numbers.
- Marketing and Communications Data - includes your preferences in receiving marketing from us and your communication preferences.
- Technical Data - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Lead Forensics

For marketing and optimization purposes contained within this Website is tracking code provided by Lead Forensics.

Lead Forensics identifies details of your organization including phone number, web address, SIC code, a description of the company. Lead Forensics tracks the history of your visit to this website, including all pages visited and viewed by you, and how long you spent on this site.

Under no circumstances will the data be used for the personal identification of an individual visitor. If IP addresses are collected, they are made anonymous immediately after collection. On our behalf Lead Forensics uses the collected information to evaluate your visits to the website, compile reports on website activities, provide other services with related website information and monitor internet usage.

If you do not agree or object to the data collection, processing and storage of your data at any time you can opt out with immediate effect by clicking on the following link:

<http://lfwebproxy.westeurope.cloudapp.azure.com:5000/?clientID=147099>

More information can be found at www.leadforensics.com. The headquarters of Lead Forensics is located in Communication House 26 York Street, London, W1U 6PZ United Kingdom.

Aggregated Data

We may also collect, use and share "**Aggregated Data**" such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Children

This website is not intended for or directed at children under the age of 16 years and we do not knowingly collect information relating to children under this age.

HOW WE COLLECT YOUR PERSONAL DATA

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

- Direct interactions. You may give us your Identity and Contact Data by filling in a form on this website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you request marketing to be sent to you or give us feedback or contact us.
- Automated. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and similar technologies.
- Third parties or publicly available sources. We will receive personal data about you from various public sources such as your company website, and LinkedIn.

HOW WE USE YOUR PERSONAL DATA

Gantrade will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained in the table below.

Purposes for which we will process the information	Legal Basis for the processing
To carry out our obligations arising from any contracts entered into with you and to supply product and provide services to you.	It is necessary for us to process your personal information in this way in order to enter into a contract with you and to fulfil our contractual obligations to you.
To provide you with information and materials that you request from us. To update you on products and services we offer.	It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to generate and develop business. To ensure we offer an efficient service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
To personalise our services and this website to you, and to improve this website.	It is in our legitimate interests to enhance your experience on our Website and to better our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.

Generally, we do not rely on consent as a legal basis for processing your personal data although we may need your consent before sending direct marketing communications to you via email or text message. Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences by contacting us as provided in “Contacting us” above.

Gantrade will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you in a timely manner and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

DISCLOSURE OF YOUR PERSONAL INFORMATION TO THIRD PARTIES

Gantrade will not sell, rent, lease or otherwise share your personal information other than as outlined in this Privacy Policy or without obtaining your consent beforehand.

We will share your personal information within the Gantrade Group as necessary to carry out the purposes for which the information was supplied or collected.

Personal information will also be shared with our third party service providers and business partners who assist with the running of this website and our services including hosting providers, email service providers. Our third party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

In addition, Gantrade may disclose information about you:

- to our professional advisers including lawyers, auditors and insurers;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- if all or substantially all of Gantrade's assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation;
- if necessary to protect the vital interests of a person; and
- to enforce or apply our terms and conditions or to establish, exercise or defend the rights of Gantrade, our staff, customers or others.

INTERNATIONAL TRANSFERS

To deliver services to you, it is necessary for us to transfer your personal information outside of the European Economic Area ("EEA") to our group companies and our service providers and business partners located outside the EEA. This includes the USA and China.

Whenever we transfer your personal data out of the EEA, we ensure appropriate safeguards are implemented in accordance with applicable data protection laws. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission which give personal data the same protection it has in Europe.

If you want further information on the specific mechanism used by us when transferring your personal information out of the EEA, please contact us using the details set out above.

SECURITY OF YOUR PERSONAL INFORMATION

Gantrade uses appropriate technical and organizational security measures to protect personal information both online and offline from unauthorized use, loss, alteration or destruction.

Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorized disclosure of personal information.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

The criteria we use for retaining different types of personal information, includes the following:

- **General queries** - when you make an enquiry or contact us by email or telephone, we will retain your information for as long as necessary to respond to your queries. After this period, we will not hold your personal information for longer than one year if we have not had any active subsequent contact with you;
- **Direct marketing** - where we hold your personal information on our database for direct marketing purposes, we will retain your information for no longer than two years if we have not had any active subsequent contact with you.
- **Legal and regulatory requirements** - we may need to retain personal information for up to 7 years after we cease providing services to you where necessary to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

YOUR RIGHTS

ACCESS TO AND UPDATING YOUR PERSONAL INFORMATION

You have the right to access information which we hold about you (“**data subject access request**”).

You may also have the right to receive personal information which you have provided to us in a structured and commonly used format so that it can be transferred to another data controller (“**data portability**”). The right to data portability only applies where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. Please keep us informed if your personal information changes during your relationship with us.

RIGHT TO OBJECT

Direct marketing

You have the right to object at any time to our processing of your personal information for direct marketing purposes.

Where we process your information based on our legitimate interests

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

YOUR OTHER RIGHTS

You also have the following rights under data protection laws to request that we rectify your personal information which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal information - this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it (“**right to be forgotten**”);
- restrict the processing of your personal information to processing in certain circumstances.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

For example, we may refuse a request for erasure of personal information where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

EXERCISING YOUR RIGHTS

You can exercise any of your rights as described in this Privacy Policy and under data protection laws by contacting us as provided in “Contacting us” above.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

COOKIES

In order to improve this website, we may use small files commonly known as “cookies”. A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your “**device**”) from this website and is stored on your device’s browser or hard drive.

We currently use the following third party cookies:

Third Party Cookies	Cookie Name(s) and Purpose	More information
Hubspot	<p>__hs_opt_out</p> <p>This cookie is used by the opt-in privacy policy to remember not to ask the visitor to accept cookies again. This cookie is set when you give visitors the choice to opt out of cookies (Expires: 2 years).</p> <p>__hstc</p> <p>The main cookie for tracking visitors. It contains the domain, utk (see below), initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session) (Expires: 2 years).</p> <p>hubspotutk</p> <p>This cookie is used for to keep track of a visitor's identity. This cookie is passed to HubSpot on form submission and used when de-duplicating contacts (Expires: 10 years).</p> <p>__hssc</p> <p>This cookie keeps track of sessions. This is used to</p>	<p>Hubspot Privacy Policy</p>

	<p>determine if we should increment the session number and timestamps in the <code>__hstc</code> cookie. It contains the domain, viewCount (increments each pageView in a session), and session start timestamp. (Expires: 30 min)</p> <p><code>__hssrc</code></p> <p>Whenever HubSpot changes the session cookie, this cookie is also set. We set it to 1 and use it to determine if the visitor has restarted their browser. If this cookie does not exist when we manage cookies, we assume it is a new session (Expires: None. Session cookie).</p>	
Google Analytics	<p><code>_ga</code></p> <p>This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. Expires after 2 years.</p> <p><code>_gid</code></p> <p>Used to distinguish users. Expires after 24 hours.</p>	Google Privacy Policy
Cloudflare	<p><code>__cfduid</code></p> <p>This cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis.</p> <p>For example, if a visitor is in a coffee shop where there may be several infected machines, but the specific visitor's machine is trusted (for example, because they completed a challenge within your Challenge Passage period), the cookie allows Cloudflare to identify that client and not challenge them again. It does not correspond to any user ID in your web application, and does not store any personally identifiable information.</p>	More information
HotJar	<p><code>_hjIncludedInSample</code></p> <p>This session cookie is set to let us know whether a visitor is included in the sample which is used to generate funnels (duration 365 days).</p>	More information

We ask for your consent to place cookies on your device, except where these are essential for us to provide you with a service that you have requested.

If you don't want us to use cookies when you use this website, you can set your internet browser not to accept cookies. However, if you block cookies some of the features on this website may not function as a result.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

LINKS

This website may, from time to time, contain links to and from the websites of our business partners, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and Gantrade does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

COMPLAINTS

If you have any questions or complaints regarding our Privacy Policy or practices, please contact us as provided in “Contacting Us” above.

If you are located in the EEA, you also have the right to complain to the relevant supervisory authority in the EEA. In the UK, this is the Information Commissioner’s Office (<https://ico.org.uk/>).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO OUR PRIVACY POLICY

Gantrade reserves the right to change this Privacy Policy from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes to this Privacy Policy, we will notify you by email or by means of a prominent notice on this website prior to the change becoming effective.

Updated and Effective as of 25 May 2018
