



GDPR – Protecting your personal data

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Pugh & Co International SA (hereinafter referred to as “Pugh”) is responsible for the processing of the personal data that you provide it or that it uses.

Pugh processes your data in complete transparency, in compliance with the Law of 8 December 1992 on privacy protection and from 25 May 2018, Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “GDPR”) (hereinafter referred to jointly as “privacy legislation”).

Procedures for obtaining personal data.

Pugh currently gathers your personal data through the following channels:

- Through our e-shop site (www.pughshop.be)
- At the time of a request for an aftersales service intervention (by telephone or e-mail)
- At the time of a request by e-mail (directly) or through our various websites:
 - o www.pugh.be
 - o www.pugh-micromet.com
 - o www.tubilite.be
 - o www.kelate.be
 - o www.actan.be
- At the time of commercial actions (trade fairs, conferences, etc.) only when a specific request is submitted to Pugh (details, information, prices, etc.).

Purposes of personal data processing

Pugh processes your personal data for the following purposes:

- In order to be able to put in place and provide the products and services that our clients would like to use, i.e. in the context of the execution of an order, a contract or a service provision
- In order to provide our clients with information about our activities, products or any other information relating to these

Personal data processed

In the context of the purposes detailed above, we collect the following data from our clients, who provide us with contact persons:

- Full name
- Gender
- Language
- Delivery and billing address
- Telephone/mobile no.
- E-mail address
- Products/Services used

When logging in to our e-shop, the following data may be used when starting up a service in your favour, namely: e-mail – user name – password (on start-up) – date of registration – company name – full name of contact person - language;

Once a service is implemented, the applications and services are managed by users and Pugh is no longer involved. No other personal data are therefore processed in the performance of these services.



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Each personal data storage is therefore extremely limited and is used solely for the purposes described in this declaration.

Pugh does not collect and does not process the data relating to your presence and activity on social networks. If this were to be the case in the future, this would only be carried out after obtaining the explicit consent of the user.

If you receive notifications or information from Pugh (general newsletter, announcements, etc.) and no longer want to receive them, you can unsubscribe at any time either through an appropriate link in the message in question or by sending a simple “Unsubscribe” message to privacy@pugh.be.

Data originating from third parties

As a general rule, Pugh does not receive or process any personal data that it requests or obtains from third parties with a view to processing personal data.

Should Pugh have to rent and/or buy a database containing personal data, it shall make sure that these data are acquired within the legal context, and notably, the context of the GDPR.

Time limit for keeping personal data

The personal data collected under the circumstances and through the channels mentioned above, are kept:

- as long as you have a relationship as a supplier or a buyer (actual or potential) of products and services with Pugh;
- to then be kept passively and saved for a maximum period of five years unless a statutory obligation or possible necessity relating to the nature of the services provided requires that these data may be consulted for a longer period of time.

Transferring personal data to third parties.

Personal data will be provided to third parties, namely suppliers, only if this is necessary for putting in place or providing a service/product; this refers to very limited data required for setting up a service which will then be managed directly by the user.

By default, all personal data are saved at local level and/or on Pugh’s servers.

If personal data were, even so, provided to third party suppliers (subcontractors) in the context of services provided for Pugh, Pugh shall take the necessary measures with these third parties to guarantee the protection and security of personal data.

Pugh does not provide any personal data to third parties with a view to exchanging personal data; apart from what is mentioned above, personal data shall accordingly be transferred only if this is legally mandatory or if explicit consent has been obtained to this end.

Technical and organisational measures

Under the applicable legislation, Pugh has taken the technical and organisational measures necessary to protect personal data against any unlawful processing.

In this respect, it should be mentioned that the personal data processed by Pugh are very limited and do not contain any sensitive personal data or data relating to minors.



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All databases in which personal data are saved, are managed through SharePoint, access to which is controlled by a user name and password policy.

Pugh has an IT services manager (GTIC) who regularly monitors the software, the firewall and the computer infrastructure, and checks whether the protection is up to date, taking account of the nature of the data saved.

Use of personal data is covered by the confidentiality obligation featured in the employment contracts of all workers concerned.

Rights of data subjects

You may, at any time, exercise your rights concerning the personal data provided by sending a message to: privacy@pugh.be.

By sending a simple request to the e-mail address given above, you may thus exercise your right to correction, restriction or use or objection to continued use, consultation, request for transfer and availability of personal data or withdrawal of consent to use of personal data (and right to be forgotten).

Each request shall form the subject of a response within thirty days of verification of the requesting party's identity.

Naturally, barring any statutory obligation or legitimate interest, any request submitted to this end shall entail the erasure, modification or transfer of the personal data in question.

In the event of a complaint, you may, at any time, send a message to the aforementioned e-mail address (privacy@pugh.be) or contact the supervisory authority in the country where you live, habitually carry on your activities or consider that an infringement has been committed.