

Privacy Policy Statement

Our Company are committed to processing personal information about our customers in ways that comply with our legal obligations as well as being clear with our customers about what we do with their personal information. Some of the key points of our privacy statement are:

✓ We don't sell your data to third parties

✓ We do make it easy for you to manage your information, you can change your communication preferences at any time

✓ We do use data to help us provide great customer service, which includes tailoring the information we share with you to help ensure that it's relevant, useful and timely,

Our company share your concern about the protection of your personal information and are committed to safeguarding your privacy.

This document covers information we collect about you, whether via our website: (our "Websites"), through our office, our agents or otherwise. Please read it carefully to understand how your personal information will be treated.

We will be the "controller" of the personal information which you provide to us or which we collect from you.

1. Personal information that we collect

We collect a range of personal information relating to you, including your:

- name;**
- email address;**
- telephone number;**
- credit or debit card information and/or other payment information;**
- IP address; and;**
- any other personal information that you choose to provide to us when you complete our online contact forms or otherwise make contact with us directly.**

2. How we use your personal information

We use your personal information as follows:

- to maintain our relationship with you whilst you are a customer;**
- to process orders and provide agreed goods and services to you;**
- for invoicing, processing payments, account set up and maintenance;**

- to communicate with you, including to respond to information requests /enquiries submitted and/or to obtain your feedback on our products and services;
- for record keeping, statistical analysis and internal reporting and research purposes;
- to ensure data security and to provide you with access to secure areas of our Websites;
- to notify you about changes to our products and services;
- to decide on and notify you about price changes;
- to monitor the quality of our products and services;
- for logistical purposes, including to plan and log delivery routes;
- to investigate any complaint, you make;
- to provide evidence in any dispute or anticipated dispute between you and us;
- to customise various aspects of our Websites to improve your experience;
- to pre-complete online forms on our Websites. For example, if you have provided an address when using one service, the Websites computers may automatically fill in that information on an order form for another service;
- as we may otherwise consider necessary to support the operation of our Websites;
- to obtain credit references, credit checks and for debt collection, fraud detection and prevention and risk management purposes;
- to monitor and/or record telephone conversations to or from you in order to offer you additional security, resolve complaints, improve our service standards and for staff training purposes; and
- to protect the rights, property, and/or safety of our company, its personnel, and others.

Marketing

We may send you direct marketing in relation to our own products and services by phone and post, if this is in line with any marketing preferences that you have provided to us.

We will only send you direct marketing in relation to our own products and services by email or SMS:

- where you have consented to this; or
- where you have not objected to this, and we are marketing similar products and services to those which were the subject of a previous sale or negotiations of a sale to you.

Your agreement to the use of your personal information for direct marketing purposes is optional and if you choose not to consent, your visit to and use of our Websites will not be affected.

You can choose to opt out of receiving direct marketing information from us at any time, through the 'Unsubscribe' link at the bottom of any emails you receive, or by contacting our companies Customer Service Centre Directly:

All contact information can be found on our website. You can contact us via mail, email or telephone or by filling in the enquiry form on our websites.

Recruitment

If you click on the “careers” button (or equivalent) on our Websites, you will be directed to our dedicated recruitment portal, provided by our supplier: Cornerstone OnDemand Limited. Before you can apply for a job on this portal, we will ask you to create an account using some basic contact details. This allows you and us to keep track of your applications(s) and you to tell us if you would like to receive email notifications about upcoming vacancies. If you choose to apply for a job that is listed on our recruitment portal, we will ask you to complete an application form and upload a C.V. and a covering letter. You can also upload supporting documentation. Before you submit these documents to us, you will be provided with a privacy notice, which provides specific information about how your personal information will be handled in connection with your application.

3. Automated decision making/profiling

Pricing Variations

We use software that processes your personal information (including contact details) and information about your transaction history with us in order to produce recommendations for periodical variations in the pricing of our products and services. We use this software to help us to decide how and when to change our prices. Our Sales Teams ultimately decide if any price change recommendations produced by the software will be applied.

Google

We use Google for a variety of marketing services, including the Google Customer Match service which matches your email address as provided to us, with information held in your Google account (if you have one) in order to enable Google to show you adverts for our products and services when you are searching on Google, using Google’s search network, shopping function, on YouTube or on Gmail.

Other marketing services of Google’s we use include Google Search which places our adverts within search results; Google Display Network which makes available to us advert space on third party websites; and Google Remarketing which places our company’s adverts on third party websites following a user having visited our website. These services use cookies (and in some instances information held in your Google account, if you have one) in order to build profiles about you, for the purposes of providing you with personalised adverts. See section 7 below for further details on cookies.

You can find out more about how your personal information may be used in connection with Google's advertising functions and options for opting out here: www.google.co.uk/intl/en/policies/technologies/ads

If you object to profiling made in relation to you or would like more information about the personal information which has been used to create a profile, you may contact us directly.

4. Legal basis for processing

In terms of the legal bases we rely on to process your personal information, these are as follows:

- where you have provided your consent: for direct marketing communications in respect of our own products and services, including in respect of marketing communications sent by electronic means (e.g. email and SMS);
- for the performance of a contract with you (such as a contract for the provision of good and services) or to take steps at your request prior to entering into this contract;
- to comply with legal obligations, including in relation to health and safety and environmental legislation, performing anti- money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation;
- to protect your vital interests or the vital interests of another person, e.g. where you or they are seriously injured or ill, or
- for our legitimate interests in:
 - management of your account (including processing payments) and our relationship with you, and communicating with you
 - operating our Websites
 - sending direct marketing in respect of our own products and services where you have not provided your consent and the marketing communication is sent by non-electronic means (e.g. post or telephone); processing orders and supplying our products and services; and
 - our internal business purposes which may include processing for the purposes of: record keeping, research, reporting and statistics, data security, to ensure the quality of our products and services, investigating and responding to queries and complaints, obtaining credit references and credit checks, providing payment performance data to credit reference agencies, changing our pricing, debt collection, fraud detection and prevention, risk management, recruitment and training of our personnel, and protecting our rights, property and safety (and that of others). You can object to processing carried out based on our legitimate interests at any time by contacting our company.

See also "Your Rights – The right to object"

5. How we share your personal information

In addition, we may share your personal information with:

- **third party provider(s) who provide the following types of services to us: marketing, market research, warehousing and logistics, software, recruitment and customer relationship management;**
- **third party providers for us to process payments that are due to us, in doing so we provide bank card details to such providers.**
- **third party providers and agents we appoint as our sales agents or to perform services on our behalf, who are provided with access to certain customers account details to process sales or provide services on our behalf.**
- **third party advertising partners, such as Google in order for them to assist us in providing you with targeted adverts (as explained above);**
- **third party loyalty schemes that you are enrolled in so that they can award your points/rewards and otherwise handle your personal information in accordance with the terms and conditions applicable to that scheme;**
- **licensed credit reference agencies, debt collection agencies and lawyers when we carry out credit checks, to report on your payment performance and/or or seek to recover debts due to us;**
- **our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;**
- **emergency services if we need to report accidents or incidents or request emergency assistance.**
- **any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety; or to protect the rights, property, or safety of our company its employees or others.**
- **investors and other relevant third parties in the event of an actual or potential sale or other corporate transaction related to our company.**
- **any other third parties, if authorised by you to do so.**

We ensure that, where your personal information is transferred to any country outside the European Economic Area this is done using “model clauses” (standard contractual clauses which have been approved by the European Commission as providing adequate safeguards to enable personal data to be transferred outside the European Economic Area) or other specific legally-approved safeguards. You can request further details and/or a copy of the relevant safeguards by con tact our company directly. The performance of services by our third-party service provider(s) may be subject to a separate privacy statement provided to you by the relevant third party. You should read any such statement carefully.

6. How long we keep your personal information

We retain your personal information for no longer than is necessary for the purposes for which the personal information is collected. When determining the relevant retention periods, we will consider factors including:

- **legal obligation(s) under applicable law to retain data for a certain period.**
- **statute of limitations under applicable law(s);**
- **(potential) disputes, and;**
- **guidelines issued by relevant data protection authorities.**

Otherwise, we securely erase your information once this is no longer needed.

7. Cookies

Where you use our Websites, we will process your personal information collected by using cookies in accordance with our Cookie Policy.

8. Links to third party websites

Our Websites contain links to other Internet websites. Unless otherwise explicitly stated, we are not responsible for the privacy practices or the content of such websites, including such sites use of any personal information. Nevertheless, in the event you encounter any third party associated with our Websites (or who claims association with our Websites) who you feel is improperly collecting or using information about you, please contact us directly and we will be happy to forward your message to the third party.

If and when we sponsor promotions, or third parties sponsor promotions in conjunction with our website, either we or the third party will post relevant privacy information in the official rules and/or registration area for the promotion. That privacy information, to the extent (if any) it conflicts with this Privacy Statement, will govern that promotion.

9. Security

We use reasonable security methods to protect the personal information that we process, including Internet standard encryption technology (“SSL or “Secure Socket Layer “technology) to encode personal information that you send to us through our websites. SSL works by using a private key to encrypt data that’s transferred over the SSL connection. To check that you are in a secure area of the Website before sending personal information to us, please look at the bottom right of your website browser and check that it displays an image of a closed padlock or an unbroken key.

However, please note that whilst we take appropriate technical and organisational measures to safeguard the personal information that you

provide to us, no transmission over the Internet can be guaranteed to be secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer to us over the Internet.

10. Your rights

The following section explains your rights. The various rights are not absolute, and each is subject to certain exceptions or qualifications.

We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. Therefore, we're providing you with the information in this Privacy Statement.

2. The right of access

You have the right to obtain a copy of your personal information (if we're processing it), and other certain information (similar to that provided in this Privacy Statement) about how it is used.

This is so you're aware and can check that we're using your personal information in accordance with data protection law.

We can refuse to provide information where to do so may reveal personal information about another person or would otherwise negatively impact another person's rights.

3. The right to rectification

You can ask us to take reasonable measures to correct your personal information if it's inaccurate or incomplete. E.g. if we have the wrong date of birth or name for you.

4. The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal information where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use the information in defence of a legal claim.

5. The right to restrict processing

You have rights to ‘block’ or suppress further use of your personal information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your personal information, but may not use it further. We keep lists of people who have asked for further use of their personal information to be ‘blocked’ to make sure the restriction is respected in future.

6. The right to data portability

You have rights to obtain and reuse certain personal information for your own purposes across different organisations. This enables you to move, copy or transfer your personal information easily between our IT systems and theirs (or directly to yourself) safely and securely, without affecting its usability. This only applies to your personal information that you have provided to us that we are processing with your consent or to perform a contract which you are a party to (such as pay and compensation services), which is being processed by automated means.

7. The right to object

You have the right to object to certain types of processing, on grounds relating to your situation, at any time insofar as that processing takes place for the purposes of legitimate interests pursued by our company or by a third party. We will be allowed to continue to process the personal information if we can demonstrate “compelling legitimate grounds for the processing which override [your] interests, rights and freedoms” or we need this for the establishment, exercise or defence of legal claims.

You have the right not to be subject to a decision based solely on automated processing (including profiling), which significantly affects you, subject to some exceptions. Where this is the case, you have the right to obtain human intervention, voice your concerns and to have the decision reviewed.

11. Updating this statement

We review our privacy practices from time to time. We ask that you bookmark and periodically review this page for updates to our Privacy Statement. We reserve the right to modify this policy effective seven (7) days after the posting of the revised Privacy Statement.

12. Contact us

For further information regarding these rights, about this Privacy Statement generally or to make a complaint please contact our company.

Please provide as much information as possible to help us identify the information you are requesting, the action you are wanting us to take and why you believe this action should be taken.

Before assessing your request, we may request additional information in order to identify you. If you do not provide the requested information and, as a result we are not able to identify you, we may refuse to action your request.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if this is necessary considering the complexity and number of requests that you have submitted.

We will not charge you for such communications or actions we take, unless:

- **you request additional copies of your personal data undergoing processing, in which case we may charge for our reasonable administrative costs, or**
- **you submit manifestly unfounded or excessive requests, in particular because of their repetitive character, in which case we may either: (a) charge for our reasonable administrative costs; or (b) refuse to act on the request.**

If after contacting our company you are still unhappy you may also complain to the Information Commissioner, all contact details are available on the Information Commissioners Website: dataprotection.ie

Cookies

1. WHO WE ARE AND HOW TO CONTACT US

Our Company (use "cookies" to help us remember details of your visit to our website ("Website") including, but not limited to technical information about your visit e.g. traffic data, location data, your IP address, the previous website from which you reached us and the type of browser you use. This information is collected and used to compile statistical data on the use of our Website and may be used to help us to improve our Website and the services we offer. Accordingly, our [Data Protection Notice](#) will apply to our treatment of the information we obtain via our cookies.

2. WHAT ARE COOKIES?

Cookies are small data files that are stored in your web browser on your computer, tablet or smartphone (each a "Device") when you visit our website. Cookies serve a number of purposes like letting you navigate between pages efficiently, remembering your preferences, interests or log in details and generally improving your experience.

Most web browsers automatically accept cookies, but if you do not want to allow cookies or only allow the use of certain types of cookies, please refer to your browser settings which should allow you to accept or deny cookies (please read section [6] below for more details about how to do this). You can also use the browser settings to withdraw your consent to the use of cookies at any time or delete cookies that have already been set on your computer. Keep in mind that by disabling certain categories of cookies, you may be prevented from accessing some features of our websites. You should be able to find more in-depth information about opting out of cookies on your browser settings menu.

3. DO WE USE COOKIES?

Yes, we use cookies to enhance the visitor experience of using our Website.

We use cookies for the following purposes:

- To customize your visit.
- To improve our Website.
- To allow visitors to register for the Website.
- To allow visitors to view our social media platforms from within our Website.

4. WHICH COOKIES DO WE USE?

General Information

Source (Where cookies come from)	
First Party Cookies	These cookies are provided by us and used by various features on our Website. Examples may include customising a visitor's visit, providing statistical information, and verifying a visitor's identity for security purposes.
Third Party Cookies	These cookies are provided by "Third Party" vendors who provide products and features we have integrated into our Website. Examples include social media sites, ad networks, and security systems.

Expiration (How long cookies last)	
Session Cookies	These cookies are added when a visitor starts to browse our Website or interacts with a specific feature and are deleted when the browser is closed.
Persistent Cookies	<p>These cookies are added when a visitor starts to browse our Website or interacts with a specific feature but may remain stored on your Device until a certain termination date is reached (in terms of minutes, days or years from the creation/update of the cookie).</p> <p>Cookies used by us have a maximum period of 2 years from the date when they are initially installed or if they are subsequently updated, from the date of the update.</p>

Cookies used by us have a maximum period of 2 years from the date when they are initially installed or if they are subsequently updated, from the date of the update.

Further details on our specific use of cookies are contained in the following table:

Name	Purpose	Expiration	Who Provides the Cookie?
guest_id	To display twitter feed	2 years	.twitter.com
lang	To display twitter feed	Unknown	cdn.syndication.twimg.com
personalization	To display twitter feed	2 years	.twitter.com
user	To register for the Website /WebAppState	Unknown	Our Company
ID	To register for the Website/ WebAppState	Unknown	Our Company

5. MANAGING AND DISABLING COOKIES

You can control the cookies placed and retained on your Device. The Data Protection Notice and this Cookie Policy are provided to be transparent about our practices regarding the use of cookies and to allow you the opportunity to make an informed choice.

Where applicable we will obtain your prior informed consent to use cookies and other tracking technologies which store or access information on your device. We would like you to keep cookies 'turned on' while you visit our Website, so you receive the best possible experience. However if you would like to turn off cookies (and withdraw your consent to our use of

cookies) you can do so by editing the settings in your browser.
Here are the locations of the cookies settings for all major web browsers:

Turn off cookies in Internet Explorer >> [Click here](#)

Turn off cookies in Chrome >> [Click here](#)

Turn off cookies in Safari >> [Click here](#)

Turn off cookies in Firefox >> [Click here](#)

Turn off cookies in Safari IOS >> [Click here](#)

Turn off cookies in Google Android >> [Click here](#)

6. WHERE CAN I GET MORE INFORMATION ABOUT COOKIES?

You can find more information about cookies by visiting the following information websites:

www.aboutcookies.org

www.allaboutcookies.org

7. CHANGES TO THIS COOKIE POLICY

We can change this Cookie Policy at any time. If we make material changes to the Cookie Policy, we will let you know either by posting the changed Cookie Policy on the Website or by sending you an email.

It's important that you review the changed Cookie Policy.

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