



## **PRIVACY POLICY**

### **Background**

This Privacy Policy is between Solweb Limited whose registered address is 2 Cedar Park, Cobham Road Ferndown Industrial Estate, Wimborne, Dorset, BH21 7SB (company number 03913463) hereafter “we”/or “us” and “you”/”your” which includes a natural person, corporate or unincorporated body (whether or not having separate legal personality).

We are the data controller and responsible for your personal data.

This Website is not intended for children and we do not knowingly collect personal data relating to children.

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

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy.

### **Contact details**

If you have any questions about this Privacy Policy, please contact our data privacy manager in the following ways:

Full name of legal entity: Solweb Limited

Email address: [info@solweb.co.uk](mailto:info@solweb.co.uk)

Postal address: 2 Cedar Office Park

Cobham Road

Ferndown Industrial Estate

Bournemouth

Dorset

BH21 7SB

Telephone number: 01202 232846

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection

issues ([www.ico.org.uk](http://www.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.

We understand that your privacy is important to you and that you care about how your personal data is used. Any personal data provided to us by you is treated with the upmost respect, and we will only collect and use personal data in ways that are consistent with our obligations and your rights under law.

### **What is Personal Data?**

Under The General Data Protection Regulation (EU) 2016/679 (“GDPR”) and The Data Protection Act 2018 (collectively the “GDPR Regulations”) defines personal data as any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Personal data covers information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

Under the GDPR Regulations, you have the following rights:

- The right to be informed about what personal data is collected and how it is used;
- The right to access the personal data we hold;
- The right to have inaccurate personal data rectified or completed if incomplete;
- The right to be forgotten and removed from any marketing database;
- The right to prevent personal data from being processed;
- Request restriction of processing of your personal data; and
- Withdraw consent

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

### **What personal data do we collect?**

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and

other details of products and services you have purchased from us.

- **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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feed-back and survey responses.
- **Usage Data** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We 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 in law 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.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **What if you fail to provide personal data?**

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 personal 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.

### **How is your personal data collected?**

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.
- **Automated technologies or interactions.** 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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU;
- (b) advertising networks such as Google and Facebook based outside the EU; and
- (c) search information providers such as Google based outside the EU.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU.

Identity and Contact Data from data brokers or aggregators inside or outside the EU.

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### **How do we use your personal data?**

Under the GDPR Regulations, we must always have a lawful reason for using any personal data that has been provided to us. Any personal data provided may be used for the following reasons;

- Contacting you regarding business enquiries;
- On-going communication with you, including by email, telephone, or postal communications;
- Managing and supporting your account;
- Supplying our services and products to you;
- Requesting products and services from you;
- Personalising our services to you; and

- Supplying you with information that you have opted-in to receive. You may contact us at any time via [info@solweb.co.uk](mailto:info@solweb.co.uk) to opt-in or out of any marketing emails we may send.

## **Visiting Our Website and cookies**

We provide a Website currently at <https://www.solweb.co.uk/> (hereafter the “Website”).

Our Website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. By continuing to browse our Website, you are agreeing to our use of cookies.

A “cookie” is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Within our Website we use cookies provided by the third-party service, Google Analytics, to help improve the quality of the services we offer. This will record the visitors to our Website, together with the session information such as the duration of the visit to our Website and the nature of the browser used. This information is for administration purposes and in the compilation of statistics used by us to assess the use of our Website.

Our Website uses Google Analytics, a web analytics service provided by Google, Inc. For this service, Google creates four (4) cookies (small text files) which can be used to evaluate the use of the Website and produce activity based reports. No personal data is retained or accessed for any other use.

Google stores the collected information on servers in the United States which may be transferred to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google.

Google Inc. are members of the US Safe Harbor Scheme. This scheme allows the transfer of data from within the EEA to countries that are outside of the EEA without having to enter into a specific data transfer agreement. Companies that sign up to the scheme are deemed to provide adequate protection for personal data transmitted from Europe.

For more information about Google Analytics please [click here](#). Google has also created their own opt-out plugin which you can get [here](#).

## **How to manage cookies**

You can also set your browser not to accept cookies which can be found within your chosen browsers settings. However, some websites rely on cookie information

to provide additional functionality, so disabling all cookies may interfere with your user experience.

Our cookies do not store financial information, or information which is capable of directly identifying you (such as your name or address). Cookies simply allow our Website to retrieve this information in order to personalise and improve your experience of our Website.

However, if you wish to restrict, block or delete cookies provided by our website – or any other website – you can use your browser to do this. Each browser is different so check the ‘Help’ menu of your particular browser to learn how to change your cookie preferences, or use the following web links:

Microsoft Internet Explorer

Help: <http://support.microsoft.com/?ln=en-gb>

How to manage Cookies in IE 11:

<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Mozilla Firefox

Help: <http://support.mozilla.org/en-US/home?as=u>

Cookies:

<http://support.mozilla.org/en-US/kb/Cookies?s=manage+cookies&r=0&e=es&as=s>

Google Chrome

Help: <http://support.google.com/chrome/?hl=en-GB>

Manage Cookies:

<http://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647>

Our analytics partner also provides the ability for users to opt-out using the following links:

Google Analytics:

<https://tools.google.com/dlpage/gaoptout>

Further information on Cookies is available online at: [www.aboutcookies.org](http://www.aboutcookies.org)

Please bear in mind that if you do this, certain personalised features of our Website and others cannot be provided to you.

Our Website is secured by an SSL Certificate, issued by the Starfield and Globalsign Secure Certificate Authority.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. You can ask us or third parties to stop sending you marketing messages at any time by ticking the relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Website hosting**

We use a third-party hosting company called "Pulsant" <https://www.pulsant.com/> to manage our Website hosting.

### **International transfer of personal data**

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six (6) years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your personal data.

In some circumstances we may 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.

## **Contacting Solweb**

Save as set out in this Privacy Policy, we do not distribute, sell or rent your name, e-mail address, or any other information about you or your organisation to any third party.

We do not send unsolicited e-mail. Your email will be used to respond to queries, updates and/or information considered relevant with respect to your website or software. If you have any concerns regarding privacy and confidentiality, please click the contact us link here **contact us**.

### **Applying for a job with Solweb?**

All of the information you provide during the job application process is only used for this purpose, or to fulfil legal or regulatory requirements, if necessary. We do share this information with our apprenticeship third parties, and any contact details provided to us will be used solely to progress your job application with us.

All data provided to us in any application form is retained according to our Data Retention Policy here <https://www.solweb.co.uk/gdpr/documents/Data-Retention-Policy.pdf>.

### **Access to Personal Information**

You have the right to request a copy of the personal data that we hold about you. If you would like a copy of some or all of your personal data, please write or email



us at [info@solweb.co.uk](mailto:info@solweb.co.uk). To ensure your data is secure, we will ask for proof of identity before any personal data is shared. Once verified, we will provide you with our completed Subject Access Request document within 30 days of the date of your initial request to allow you to review the personal data. Occasionally it may take us longer, 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. Where you are sending us a request via post rather than email we recommend you send it via recorded delivery to guarantee safe delivery.

If any of your personal data is incorrect, you may ask us to correct or remove this information.

Any personal data collected and retained is stored securely on our internal network, which can only be accessed within the Solweb domain. We utilise a CRM, hosted locally with no external access.

Should any physical documents be provided to us that require retention, these will be stored in locked filing cabinets. If physical documents are not required by Solweb, they will be shredded and disposed of as soon as appropriate.

### **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

Internal Third Parties. Other companies in our group acting as joint controllers or processors and that provide IT and system administration services and undertake reporting.

External Third Parties. Including service providers acting as processors or hosts who provide IT and system administration services and service agents for support and delivery companies for the transportation of products.

Professional advisers acting as processors or joint controllers including solicitors, barristers, bankers, auditors and insurers based in the United Kingdom or EEA who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Government Agencies, for example for fraud or illegal activities.

Third parties to whom we may choose to sell, transfer, or merge parts or all of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all 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.

### **Links to external websites**

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

### **Changes to our Privacy Policy**

We keep our Privacy Policy under regular review, with all updates being posted to this page. This Privacy Policy was last updated in August 2019.

### **Partnership**

Nothing herein contained shall give rise to a partnership or a contract of employment between you and us.

### **Assignment**

You may not assign, mortgage or otherwise transfer this Privacy Policy, data or any rights, duties and obligations hereunder. It is acknowledged by you that we may use our employees, officers, representatives or third party consultants to carry out our work within this Privacy Policy. We may assign the benefit of this Privacy Policy, data or any rights, duties or obligations to any firm or company in which we hereafter acquire a controlling interest or which acquires a controlling interest in us without prior approval from you. Save that we shall remain primarily liable hereunder until such time as the prospective assignee enters into an agreement to fulfil our obligations hereunder.

### **Waiver**

No waiver or affirmation of any breach of or non-compliance with any term hereof by the parties shall be deemed to be a waiver or affirmation of any preceding or succeeding breach of or non-compliance with the same or any other term.

### **Third parties**

Save to the extent expressly set out herein, this Privacy Policy and is not intended to nor shall it create any rights, entitlements, claims or benefits enforceable by any person that is not a party hereto. Accordingly, save to the extent expressly set out in this Privacy Policy, no person shall derive any benefit or have any right entitlement or claim in relation to this agreement by virtue of the Contract (Rights of Third Parties) 1999.

### **Jurisdiction**

This Privacy Policy shall be governed by and construed in accordance with the laws of England. The parties irrevocably agree that the English Courts shall have exclusive jurisdiction to settle any dispute arising out of or in connection with this Privacy Policy.