# Grafenia plc: privacy policy

# INTRODUCTION AND PURPOSE OF DOCUMENT

Welcome to the privacy notice of Grafenia plc and its subsidiaries (referred to as "Grafenia Group"). We respect your privacy and are committed to protecting your personal data.

The purpose of this privacy notice is to give you information on how Grafenia Group collects and processes your personal data:

(a) through your use of any website operated by Grafenia Group, including any data you may provide through such website when you register, log-in, sign up to our services, purchase a product or service or take part in any promotion; and

(b) when you deal or interact or communicate with Grafenia Group through any channel (via our systems, by email, post, phone, other electronic communications or otherwise) as a customer, supplier or service provider (actual or potential), or in any other capacity (although potential and actual candidates or employees are subject to separate privacy policies);

and also tells you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy <u>here</u>.

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## **1. IMPORTANT INFORMATION AND WHO WE ARE**

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

References in this notice to "you" are to an individual who uses our website or otherwise interacts with us as a prospective or actual customer, partner, licensee or supplier or as a visitor (in each either on your own behalf or on behalf of a separate organisation).

## Controller

Grafenia Group is made up Grafenia plc and all of its various subsidiaries.

This privacy notice is issued on behalf of the Grafenia Group, so when we mention "we", "us" or "our" in this privacy notice, we are referring to the relevant company in Grafenia Group responsible for processing your data.

Grafenia Operations Limited will normally be the controller of your Personal Data, unless we notify you differently when our relationship with you (or the business or enterprise you represent) is known, for, example when you submit data to us via our website or when you register or purchase with us or order products or services from us.

#### **Licensed Partners**

A number of products and services are sold by third parties under licence from Grafenia Group (referred to in this notice as "Licensed Partners"). You may be directed at your request or direction from this website to a website (or ecommerce portal or ordering page) that is operated by such Licensed Partners under licence from us. In such event your personal data may be shared with such Licensed Partners for the purposes of responding to or fulfilling your request or order.

Where you register with, and/or enquire or order goods or services from, Licensed Partners, the Licensed Partner may be a controller of personal data submitted to or collected by the Licensed Partner. In such cases, the Licensed Partner's processing of your personal data may be subject to a separate privacy notice issued by the Licensed Partner. We are not responsible for the issue of such privacy notice.

## **Contact us**

If you have any questions about this privacy notice including any requests to exercise your legal rights or otherwise relating to your personal data, please contact us at privacy@grafenia.com.

Alternatively you can write to us at:

Grafenia plc Third Avenue The Village Trafford Park Manchester M17 1FG

**Children**: This website is not intended for children and we do not knowingly collect data relating to children.

## Changes to this Privacy Policy and your duty to keep us updated.

This version was last updated on 24 May 2018 and historic versions are archived here.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

# Third party links

This 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 data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy notice of every website you visit.

# 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together 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, feedback 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 may be derived from your personal data but is not considered personal data in law as this data does **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 notice.

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.

**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 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.

# 3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

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

- create an account on our website or by any other channel or means;
- log into your account (when the Personal Data we collect will include name and address, telephone, email address, user name and password; this provides us with default details for your order processing and sets up security (so viewing of your account details, designs and order history is password protected);
- apply or place an order for our products or services (when we will allocate you a customer number, capture order details, invoicing address, shipping address and credit card details to process and fulfil your order; Invoicing address and shipping addresses are retained so you do not have to enter them again. Order details are retained so you can view your order history);
- make selections and choices in response to questions we ask to help you choose the right product and design to suit your purpose/business;
- pay for any products or services (for example when you enter credit card details you are in communication over a secure link with any financial system we may use, from time to time). We retain reference of the credit card transaction. The payment gateway may also hold card details in accordance with PCI DSS compliance;
- subscribe to our service or publications;
- request marketing to be sent to you;

- enter a competition, promotion or survey;
- give us feedback;
- request or need sales and order support, including when we assist you in completing orders of products or services and arrange shipments; or
- request or need service support including when we communicate with you about services provided by us, which may include responses to your inquiries or requests or updates on service delivery.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical and Usage 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. Please see our <u>cookie policy</u> for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

• Technical Data from the following parties:

(i) analytics providers such as Google based inside or outside the EU;

(ii) advertising networks such as Mailchimp based inside or outside the EU; and

(iii) search information providers such as Google based inside or outside the EU.

- Identity, Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe, Worldpay, Paypal, UK Mail, DHL and Zendesk based inside or outside the EU.
- Identity and Contact Data from data brokers or aggregators such as Dun & Bradstreet, Business Lists UK and Fulcio based inside or outside the EU.
- Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register based inside the EU.

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where:

• we need to perform the contract we are about to enter into or have entered into with you or to take steps at your request before entering into such a contract;

- it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- we need to comply with a legal or regulatory obligation that we are subject to.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Further details of our legitimate interests used as a basis for processing your personal data are set out in the Table below. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by <u>contacting us</u>.

## **Consent and Marketing**

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time. You can opt out by ffollowing the opt-out links on any marketing message sent to you, or via your account profile settings or by <u>contacting us</u>.

There may be other specific situations where we seek your consent to certain types of processing of your personal data in which case, consent will be the basis for processing of that particular type of processing.

## Purpose and basis of processing

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please <u>contact us</u> if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or partner	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Financial</li> <li>(d) Marketing and</li> <li>Communications</li> </ul>	<ul><li>(a) Performance of a contract with you.</li><li>(b) Necessary for our legitimate interests (to keep and administer customer records).</li></ul>
To process, fulfil and deliver customer, supplier and licensee orders including:	(a) Identity (b) Contact (c) Financial	<ul><li>(a) Performance of a contract with you.</li><li>(b) Necessary for our legitimate</li></ul>

<ul><li>(a) Managing payments, fees and charges.</li><li>(b) Collecting and recovering money owed to us.</li></ul>	(d) Transaction	interests (to procure and deliver products and services; to recover debts due to us).
To manage and maintain our relationship with you or your organisation which will include: (a) Notifying you about changes to our terms or privacy policy. (b) Asking you to leave a review or take a survey. (c) Ensuring that complaints, enquiries and service requests are investigated, supported and managed	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<ul> <li>(a) Performance of a contract with you.</li> <li>(b) Necessary to comply with a legal obligation.</li> <li>(c) Necessary for our legitimate interests (to deliver products and services; to keep our records updated and to study how customers use our products/services).</li> </ul>
To enable you to partake in a promotion or complete a survey or feedback request.	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and</li> <li>Communications</li> </ul>	<ul> <li>(a) Performance of a contract with you.</li> <li>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).</li> </ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	<ul> <li>(a) Necessary for our legitimate interests</li> <li>(for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).</li> <li>(b) Necessary to comply with a legal obligation.</li> </ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and</li> <li>Communications</li> <li>(f) Technical</li> </ul>	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).

To carry out direct marketing via our website and other channels and communications.	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Transaction</li> <li>(d) Technical</li> <li>(e) Usage</li> <li>(f) Marketing and</li> <li>Communications</li> </ul>	Necessary for our legitimate interests (to grow our business and to inform our marketing strategy; to develop our products/services and grow our business). However, where we have requested your consent for any direct marketing, the basis of processing shall be consent.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To respond to your enquiry and/or make suggestions and recommendations to you about goods or services that may be of interest to you.	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Transaction</li> <li>(d) Technical</li> <li>(e) Usage</li> <li>(f) Profile</li> <li>(g) Marketing and</li> <li>Communications</li> </ul>	Necessary for our legitimate interests (to develop our products/services and grow our business).
To ensure network, information and system security	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and</li> <li>Communications</li> <li>(f) Technical</li> </ul>	<ul> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, business reorganisation or group restructuring exercise).</li> <li>(b) Necessary to comply with a legal obligation.</li> </ul>
To carry out corporate operations and due diligence (reporting of management information, operation of financial/risk/credit models, back office operation, managing third party service providers, corporate reorganisations, corporate or asset sales of TES companies or businesses).	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and</li> <li>Communications</li> <li>(f) Technical</li> <li>(g) Transaction</li> </ul>	<ul> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, business reorganisation or group restructuring exercise, investment or sale of TES group companies or business)</li> <li>(b) Necessary to comply with a legal obligation.</li> </ul>

To procure goods and services or other tangible or intangible assets or property from suppliers and to procure sub-contractors	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and</li> <li>Communications</li> <li>(f) Technical</li> <li>(g) Transactional</li> </ul>	<ul> <li>(a) Performance of a contract with you;</li> <li>(b) Necessary for our legitimate interests (to procure and deliver products and services; to carry on our core operations and business; to grow our business)</li> </ul>
To report potential crimes to relevant authorities or assist with their enquiries.	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Technical</li> <li>(f) Transactional</li> </ul>	<ul> <li>(a) Necessary for our legitimate interests</li> <li>(for running our business, provision of administration and IT services, network security).</li> <li>(b) Necessary to comply with a legal obligation.</li> </ul>
To detect and prevent, by appropriate measures, fraud and crime.	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Technical</li> <li>(g) Transactional</li> </ul>	<ul> <li>(a) Necessary for our legitimate interests</li> <li>(for running our business, provision of administration and IT services, network security).</li> <li>(b) Necessary to comply with a legal obligation.</li> </ul>

We may need to transfer your personal data to other entities within Grafenia Group and our Licensed Partners for the purposes of registering you with Grafenia Group, assigning or referring you to one of our Licensed Partners (at your request or direction), responding to your enquiries or providing goods and services to you.

## Marketing

We will get your express opt-in consent before we share your personal data with any company outside the Grafenia Group for marketing purposes.

# **Opting Out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or via your account profile settings or by <u>contacting us</u> 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 and for use in respect of a product/service purchase, warranty registration, product/service experience or other transactions or other non - marketing purposes outlined in this notice.

## **Promotional Communications from us**

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 or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

# Cookies

Our website uses cookies. More information is set out in the Cookie section of this website.

## **Change of Purpose**

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please <u>contact us.</u>

If we need to use your personal data for an unrelated purpose, we will notify you 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, in compliance with the above rules, where this is required or permitted by law.

# 5. 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 in paragraph 4 above.

**Internal Third Parties** - other companies in the Grafenia Group acting as joint controllers or processors and who provide IT and system administration services and undertake leadership reporting and/or who provide services in order to fulfil our contract with you.

## **External Third Parties**:

- Service providers acting as processors who provide IT and system administration services, data analytics, marketing or other services
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Partners or licensees of Grafenia Group acting as processors or controllers who will provide goods or services to you under licence from Grafenia Group or related goods or services.
- Third parties to whom we may choose to sell, transfer, or merge parts 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 notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit our third party service providers to process your personal data for specified purpose sand in accordance with our instructions.

# 6. INTERNATIONAL TRANSFERS

We share your personal data within the Grafenia Group. This may involve transferring your data outside the European Economic Area (**EEA**).

Some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA (whether this is within the Grafenia Group or to an external third party), we ensure a similar degree of protection is afforded to your personal data 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 external service providers or otherwise transfer your personal data to an external third party or other Grafenia Group entity outside the EEA, we may use specific contracts between the exporter and importer containing standard contractual clauses 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 transfer your personal data to another Grafenia Group entity outside the EEA, as an alternative to the Model contracts mentioned in the previous paragraph, we may require our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, see *European Commission: Binding corporate rules*.
- Where we use certain external service providers or otherwise transfer your personal data to an external third party or other Grafenia Group entity 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 <u>contact us</u> if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

# 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 8. 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.

Please <u>contact us</u> if you want further information on the retention periods used by us for different aspects of your personal data.

In some circumstances you can ask us to delete your data: see <u>Request erasure</u> below for further information.

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.

#### 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

**No fee usually required**: You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances to the extent permitted by applicable laws including GDPR.

What we may need form you: We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**: We try to respond to all legitimate requests within one month. Occasionally it may 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.

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

# **10. COOKIES**

Our websites use cookies in various locations.

Cookies are small text files which are deposited on your computer and stored by your browser, for example, Internet Explorer or Safari, and they allow websites to recognise users and remember things like user preferences.

Which cookies we use? - We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time.

**Strictly necessary cookies** - These cookies are essential in order to enable you to navigate our website and use its features. These cookies typically don't contain any personally identifiable information and are set by us.

**Functional Cookies** - These cookies are used to improve the functionality of the site. For example, if you fill out one of our enquiry forms, we set persistent cookies to store your information so you don't have to enter it more than once if you so choose.

**Performance Cookies** - These cookies collect information about how visitors use this website, for example how long is spent on a particular page, how long the page took to load or if there were any errors encountered. These cookies do not contain any personally identifiable information.

**Geotargetting cookies** - We set a geotargetting cookie based on the information supplied by your browser when you visit our site. The information is used to autofill some forms and to help us provide you with the most relevant content based on your location.

**Targeting/Advertising Cookies** - These cookies are used to help measure the effectiveness of our digital advertising campaigns.

**Other Third Party Cookies** - Some cookies that have been set on our websites are not related to this website. When you visit a page with content embedded from, for example, Facebook or Google, these service providers may set their own cookies on your web browser. We do not have access or control over these cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them.

If you take the opportunity to 'share' our content with friends through social networks – such as Facebook and Twitter – you may be sent cookies from these websites. We do not control the setting of these cookies, so please check the third-party websites for more information about their cookies and how to manage them.

#### Can I remove existing cookies?

You can remove persistent cookies by following directions provided in your Internet browser's "help" file. For more information about cookies and how to manage or delete them, please visit <u>www.aboutcookies.org</u>.

#### Can I disable cookies?

Yes, you can disable cookies in your browser by following directions provided in your Internet browser's "help file". If you choose to disable cookies, you may still use our site, but your ability to use some areas of our site will be limited. For more information on how to disable cookies, please visit <u>www.aboutcookies.org</u>.

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about how to disable the cookies please consult the information pages of the provider of the browser you are using.

#### **Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

#### Further information about cookies

If you'd like to learn more about cookies in general and how to manage them, visit <u>aboutcookies.org</u> (opens in a new window – please note that we can't be responsible for the content of external websites).

#### **Managing cookies**

If cookies aren't enabled on your computer, it will mean that your shopping experience on our website will be limited to browsing and researching; you won't be able to add products to your basket and buy them.

#### To enable cookies

If you're not sure of the type and version of web browser you use to access the Internet, click on 'Help' at the top of your browser window and select the 'About' option (for PCs) or with the browser window

open, click on the Apple menu and select the 'About' option (for Macs).

## How to check cookies are enabled for PCs

#### **Google Chrome**

Click on 'Tools' at the top of your browser window and select Options. Click the 'Under the Hood' tab, locate the 'Privacy' section, and select the 'Content settings' button. Now select 'Allow local data to be set.

#### Microsoft Internet Explorer 6.0, 7.0, 8.0

Click on 'Tools' at the top of your browser window and select 'Internet options', then click on the 'Privacy' tab. Ensure that your Privacy level is set to Medium or below, which will enable cookies in your browser. Settings above Medium will disable cookies.

#### **Mozilla Firefox**

Click on 'Tools' at the top of your browser window and select Options. Then select the Privacy icon. Click on Cookies, then select 'allow sites to set cookies'.

#### Safari

Click on the Cog icon at the top of your browser window and select the 'Preferences' option. Click on 'Security', check the option that says 'Block third-party and advertising cookies'. Click 'Save'.

#### How to check cookies are enabled for Macs

#### **Microsoft Internet Explorer 5.0 on OSX**

Click on 'Explorer' at the top of your browser window and select 'Preferences' options. Scroll down until you see 'Cookies' under Receiving Files. Select the 'Never Ask' option.

## Safari on OSX

Click on 'Safari' at the top of your browser window and select the 'Preferences' option. Click on 'Security' then 'Accept cookies'. Select the 'Only from site you navigate to'.

#### Mozilla and Netscape on OSX

Click on 'Mozilla' or 'Netscape' at the top of your browser window and select the 'Preferences' option. Scroll down until you see cookies under 'Privacy & Security'. Select 'Enable cookies for the originating web site only'.

#### Opera

Click on 'Menu' at the top of your browser window and select 'Settings'. Then select 'Preferences', select the 'Advanced' tab. Then select 'Accept cookies' option.

#### All other browsers

Please consult your documentation or online help files.