

### **PRIVACY POLICY**

#### **BACKGROUND:**

BWB Technologies Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website, www.bwbtech.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site and you will be required to read and accept this Privacy Policy when signing up for an Account or submitting a Form through Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

# #KeepItSimple

We try to protect you and your data as best we can. By using our site without adjusting your internet settings you accept our use of cookies and the statements within this policy.

# 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account" Means an account required to access and/or use

certain areas and features of Our Site:

"Form" Means a data capture or contact form whereby you

provide the information for us to assist and/ or

download content or literature.

"Cookie" Means a small text file placed on your computer or

device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in

Part 14, below; and

"Cookie Law" Means the relevant parts of the Privacy and Electronic

Communications (EC Directive) Regulations 2003;

"Our Site" <u>www.bwbtech.com</u>

"Us" BWB Technologies Ltd

#### 2. Information About Us

Our Site is owned and operated by BWB Technologies, a Limited company registered in England under company number 05560228.

Registered and trading address: Unit 7-8 Galloway Centre, Newbury, Berkshire, RG14 5TL, UK.

### #KeepItSimple

Here's how to get in touch if you need to speak with us.



VAT number: 867908662

# 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious 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.

## 5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete.
   Please contact Us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that we have. Please contact Us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have

# #KeepItSimple

We only have control of our site. Links to external sites and the cookies they use are out of our control.

# #KeepItSimple

Personal data is, any information about you that enables you to be identified.

## #KeepltSimple

You have the following rights:

To be informed about how we collect and use your data.

To access the data we hold on you and have it updated or completely deleted.

To restrict what data we hold and how we process it including complete objection.



provided personal data to Us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.

h) Rights relating to automated decision-making and profiling.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

### 6. What Data Do We Collect?

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data (please also see Part 14 on Our use of Cookies and similar technologies and Our Cookie Policy HERE):

- Name:
- Business address:
- Business Email address:
- Business telephone number;
- Business name;
- Job title:
- Profession;
- Information about your preferences for direct marketing;
- Further / additional information you may provide to us by way of email communication or completion of voluntary fields within data capture forms;
- IP address:
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

### #KeepItSimple

Here's a list of the type of data we may collect.



# 7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data, or because it is in Our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your Account;
- Providing and managing your access to Our Site;
- Supplying Our products and services to you. Your personal details are required in order for Us to enter into a contract with you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us by email at <a href="mailto:privacy@bwbtech.com">privacy@bwbtech.com</a> or clicking the unsubscribe link you'll find in the bottom of our emails).
- Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.

With your permission, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone or post with information, news, and offers on Our products or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We do not use any automated systems for carrying out any decision-making and or profiling.

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- If you have purchased products through us your information will be kept on record for an indefinite period unless you ask us to remove it. This allows us to provide you with our services throughout the lifetime of the product;
- If you contact us through the website or download one of product datasheets your information will be stored in our

### #KeepItSimple

Here's a list of how we use your data.

### #KeepItSimple

Your data is kept on our records for 5 years or for life if you purchase products through us, unless you tell us to delete it.

# #KeepItSimple

We only store your data within GDPR approved states and ensure it's not accessed by anyone without our permission.



records for up to 5 years. This time frame will be extended upon each re-engagement with Us unless you ask Us to delete your information.

# 9. How and Where Do You Store or Transfer My Personal Data?

We store your data within cloud based platforms hosted and backed-up across the world. We ensure that our cloud based service providers are fully compliant with the EU GDPR.

Additionally we store your data locally within our organisation in the UK.

The security of your personal data is essential to Us, and to protect your data, we take a number of important measures, including the following:

- · Limited access to key employees
- Password protected access to cloud based storage systems

# 10. Do You Share My Personal Data?

We may share your data for legitimate business purposes with our legitimate business partners. These partners in most instances include our authorised distributors for the region in which you're located.

We will not share any of your personal data with any third parties for any purposes, subject to one important exception;

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

### 11. How Can I Control My Personal Data?

In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your personal data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails or at the point of providing your details).

### 12. Can I Withhold Information?

You may access all of Our Site without providing any personal data at all, excluding the following collected through our analytical services:

# #KeepItSimple

Unless required to by law we don't share your data with any third parties.



- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict Our use of Cookies. For more information, see Part 14 and Our Cookie Policy HERE.

# 13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell Us everything we need to know to respond to your request as quickly as possible, we may, upon receipt of your request, ask you to complete a Subject Access Request Form if all of the information we require to complete your request is not originally present.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will try and respond to your subject access request within 168 hours and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of Our progress.

#### 14. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and

## #KeepltSimple

Excluding this list, you may prevent us from collecting any of your personal data. You can view our Cookie Policy HERE to see how to go about restricting Cookies.

# #KeepItSimple

Want to know the information we hold on you? Simply ask. We'll ask you to fill in a subject access request form to ensure we have all the information we need from you in order to identify you on our system. We may also ask for ID to prove your identity. We aim to respond to such a request within 168 hours (that's 7 days).



personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies (other than strictly necessary Cookies) are placed on your computer or device, you will be shown an acceptance message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies can be found in our Cookie Policy available <a href="HERE">HERE</a>. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed within our Cookie Policy <a href="HERE">HERE</a>, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

Our Site uses analytics services provided by Google Analytics®. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products and services offered through it.

The analytics service used by Our Site uses Cookies to gather the required information. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

This list of Cookies used by Our analytic service can be found in our Cookie Policy <u>HERE</u>.

You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device, alternatively refer to our Cookie Policy HERE for some useful websites for further information.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and

# #KeepItSimple

Cookies are used in conjunction with Cookie law. We use Cookies to facilitate and improve your experience on Our site and analyse traffic flow through the site.

## #KeepItSimple

You can disable Cookies in your internet browser, for instructions on how to do so, take a look at our Cookie Policy, HERE.



guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### 15. How Do I Contact You?

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of: Hozan Edwards
Email address: <a href="mailto:privacy@bwbtech.com">privacy@bwbtech.com</a>
Telephone number: +44 (0) 1787 273451

Postal Address: BWB Technologies Ltd, Unit 7-8 Galloway

Centre, Newbury, Berkshire, RG14 5TL, UK

# 16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change Our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

# #KeepItSimple

Here's how to get in touch if you need to speak with us.

# #KeepItSimple

Depending on regulations, law and our use of Cookies or personal data we may need to change this Privacy Policy. We suggest you refer back now and then to ensure you're happy with our current terms. You'll find a document version number in the footer on each page.