

# 360 VISION TECHNOLOGY LIMITED - PRIVACY POLICY

## 1 ABOUT THIS POLICY

1.1 We appreciate your interest in our products and services. Your privacy is important to us and we want you to feel comfortable with how we use and share your personal information.

1.2 This policy sets out how 360 Vision Technology Limited handle your personal information, including when and why it is collected, used and disclosed and how it is kept secure.

1.3 You will find our contact details at the end of this policy that you can use if you have any questions, including how to update or access your personal information or to make a complaint.

1.4 This policy may change, so please check this page from time to time to ensure that you're happy with any changes. Please see further Changes to this policy in Section 11.

1.5 This policy was last updated on 25<sup>th</sup> May 2018.

## 2 WHO WE ARE

2.1 360 Vision Technology Limited is located in the UK.

2.2 Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to 360 Vision Technology Limited.

## 3 HOW AND WHAT PERSONAL INFORMATION WE COLLECT

3.1 We may collect and process the following personal information about you.

**Personal information you give to us:** This is information about you that you give to us by entering information via our website, social media pages or by corresponding with us by phone, email or otherwise and is provided entirely

voluntarily. The information you give to us may include your name, contact details (such as phone number, email address and address), enquiry details.

**Personal information we collect about you:** We may automatically collect the following personal information: our web servers store as standard details of your browser and operating system, the website from which you visit our website, the pages that you visit on our website, the date of your visit, and, for security reasons, e.g. to identify attacks on our website, the Internet protocol (IP) address assigned to you by your internet service.

3.2 Please see further How we use your personal information in Section 4 for details of the purposes for which we use the personal information we obtain from these sources and the legal basis on which we rely to process that information. The remaining provisions of this policy also apply to any personal information we obtain from these sources.

## **4 HOW WE USE YOUR PERSONAL INFORMATION**

### **4.1 Where you have provided CONSENT**

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- to share your personal information with our authorised installers and distributors to arrange technical and sales support.
- to supply brochures and other material you have specifically requested from us.
- to contact you via email, text message, post or telephone with marketing information about 360 Vision Technology Limited products and services (see Marketing section below for further details);
- 4.2 You may withdraw your consent for us to use your information in any of these ways at any time. Please see Withdrawing your consent in Section 8.4 for further details.

### **4.3 We are required to perform a CONTRACT with you**

We may use and process your personal information where it is necessary for the performance of a contract with you or in order to take steps at your request before entering into a contract with you including for the following purposes:

- To exchange information for warranty support;

### **4.4 Where it is in your VITAL INTEREST**

We may use your personal information to contact you if there are any urgent safety or product issues to communicate to you or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your vital interests for us to use your personal information in this way.

#### 4.5 Where there is a **LEGITIMATE INTEREST**

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes:

- for analysis to inform our marketing strategy;
- to administer our eNews and website and for internal operations, including troubleshooting, testing, statistical purposes;
- for the prevention of fraud and other criminal activities;
- to correspond and communicate with you;
- to create a better understanding of you as a customer or visitor;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; and
- for general administration including managing your enquiries, queries or complaints.

## 5 OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION

### 5.1 Our suppliers and service providers

We may disclose your information to our third party sales and service providers for the purposes of providing services to you. Such third parties may include hosting

and email management service providers (such as) or marketing agencies, administrative services or other third parties who provide services to us.

## 5.2

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

## 5.3 **Dealers (installers and integrators) in our network**

We may share your information with other companies within our Dealer Network. They may use your personal information in the ways set out in How we use your personal information in Section 4 or in connection with products and services using our own range of products and services.

## 6 **WHERE WE STORE YOUR PERSONAL INFORMATION OUTSIDE THE EEA**

6.1 All information you provide to us may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen where our servers or those of our third party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK.

6.2 If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

6.3 If you use our services whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

## 7 **HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR**

7.1 If we collect your personal information, the length of time we retain it is determined by a number of factors, including the purpose for which we use that information and our obligations under other laws.

7.2 We do not retain personal information in an identifiable format for longer than is necessary.

## **8 YOUR RIGHTS**

### **8.1 Accessing your personal information**

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

### **8.2 Correcting and updating your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy.

### **8.3 Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, as set out under How we use your personal information in Section 4, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can also do so using our Unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

### **8.4 Objecting to our use of your personal information and automated decisions made about you.**

Where we rely on our legitimate B2B business interests as the legal basis for processing your personal information for any purpose(s), as our under How we use your personal information in Section 4, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our Unsubscribe tool.

You may also contest a decision made about you based on automated processing by contacting us.

## 8.5 Erasing your personal information or restricting its processing

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to **restrict processing** your personal information in the following situations:

- where you believe it is unlawful for us to do so,
- you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.

In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

## 9 SECURITY / COOKIES / LINKS / SOCIAL PLUGINS

### 9.1 Security measures we put in place to protect your personal information

360 Vision Technology Limited use technical and organisational security measures to protect the personal information supplied by you and managed by us against manipulation, loss, destruction, and access by third parties. Our security measures are continually improved in line with technological developments.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information whilst in transit to our website and any transmission is at your own risk.

Where we have given (or where you have chosen) a password that enables you to access an account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## 9.2 Links to other websites

Our website may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites and Apps, so we encourage you to read their privacy statements. We are not responsible for the privacy policies and practices of other websites and Apps (even if you access them using links that we provide) and we provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## 9.3 Social plugins

We use so-called social plugins (buttons) of social networks such as Facebook, Google+ and Twitter.

When you visit our website, these buttons are deactivated by default, i.e. without your intervention they will not send any data to the respective social networks. Before you are able to use these buttons, you must activate them by clicking on them. They then remain active until you deactivate them again or delete your cookies. Please see Cookies in Section 9.2 for further details regarding our use of cookies.

After their activation, a direct link to the server of the respective social network is established. The contents of the button are then transmitted from the social network directly to your browser and incorporated in the website.

We have no influence on the scope of data that is collected by the social networks through their buttons. The data use policies of the social networks provide information on the purpose and extent of the data that they collect, how this data is processed and used, the rights available to you and the settings that you can use to protect your privacy.

# 10 MARKETING

10.1 We may collect your preferences to send you marketing information directly from us by email (where applicable) including:

- if you sign-up to our newsletter online; or

- if you visit us at a trade exhibition or request a call back.

We will only do so if you have consented to receiving such marketing information directly from us.

10.2 From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you consent to continue receiving marketing information from us.

## 11 CHANGES TO THIS POLICY

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our website and/or by contacting you by email. Any changes will take effect 7 days after the date of our email or the date on which we post the modified terms on our website, whichever is the earlier. We recommend you regularly check for changes and review this policy when you visit our website. If you do not agree with any aspect of the updated policy, you must promptly notify us and cease using our services.

## 12 CONTACT US

If you have any questions, suggestions or complaints about the processing of your personal information or wish to contact us to amend/update your marketing preferences with 360 Vision Technology Limited, please contact us at the contact details below:

Nick Samuel  
360 Vision Technology Limited  
Unit 7 Seymour Court  
Manor Park  
Runcorn  
Cheshire  
WA7 1SY  
United Kingdom

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