Description

Volution Group plc and subsidiaries

Privacy Notice

1. **INTRODUCTION**
    1. Volution Group plc and its subsidiaries (**Volution Group**, **we** or **us**) are committed to protecting and respecting your privacy.
    2. This Privacy Notice, along with any terms of use and other documents referred to in it (the **Privacy Notice**) sets out the basis on which any personal data that we collect from you via any Volution Group website or by any other means, or that you provide to us via any Volution Group website or other means, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it. By visiting our website or any other Volution Group website (together referred to as the â??**Website**â?•) or by providing personal data to us by any other means, means you are accepting and consenting to the practices described in this Privacy Notice.
    3. For the purpose of the General Data Protection Regulation, the data controller is Volution Group plc whose head office is Fleming Way, Crawley, West Sussex RH10 9YX, United Kingdom.
    4. We may update this Privacy Notice from time to time. Any changes we make in the future will be posted on the Website. Please check regularly to see any updates or changes to this Privacy Notice.

2. **DATA PROTECTION OFFICER**
    1. The contact details for our Data Protection Officer are as follows:
        1. Email: DataProtection@volutiongroupplc.com
        2. Telephone: 01293 441662
        3. Letter: Data Protection Officer, Volution Group plc, Fleming Way, Crawley, West Sussex RH10 9YX, United Kingdom
    2. It is the responsibility of the Data Protection Officer to keep our organisation and our staff informed and advised about their obligations to comply with data protection laws, to monitor compliance with those laws, to advise on data protection impact assessments, to train staff and conduct internal audits, and to be the first point of contact for supervisory authorities and for individuals whose personal data we are processing.
    3. You can contact the Data Protection Officer if you have any questions or concerns about personal data and privacy matters, or about this Privacy Notice. Please include the words DATA PROTECTION QUERY in the subject line of your email, or at the top

of your letter.

4. The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services. Please check all such policies before you submit any personal data to these websites or use these services.

3. **DEFINITIONS** In this Privacy Notice:
    1. **Submitted Information** means information about you that you give us by filling in forms on the Website or by providing to us by any other means. It includes information you provide when you register to use the Website, complete any on-site forms, subscribe to any of our services through the Website, search for a product or place an order on the Website, participate in discussion boards or other social media functions on the Website, enter a competition, promotion or survey through the Website, and when you report a problem with the Website or provide information to us by any other means. This category of information may include your name, address, e-mail address and phone number, personal description and image.
    2. **Technical Information** means the following types of information that we will collect automatically each time you visit the Website: (a) technical information, which may include the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and (b) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.
    3. **Third Party Information** means (a) information we receive about you if you use any of the other websites we operate or the other services we provide, and (b) information we receive about you from third parties with whom we work, such as business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, and credit reference agencies.

4. **INFORMATION WE COLLECT ABOUT YOU**

We may collect and process the following data about you through the Website or by any other means: Submitted Information, Technical Information, and Third Party Information. Such information will be held for as long as we are required to do so in order to comply with our statutory and contractual obligations, and in accordance with our legitimate interests as a data controller.

5. **COOKIES**

The Website uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse the Website, and also allows us to improve the Website. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy.

6. **LAWFUL BASIS OF PROCESSING**

We will process the personal data that we obtain through the Website or by any other means only on one or more of the following bases:

1. that you have given your consent to the processing of your personal data for the purposes of receiving communications (including marketing communications) from us; and/or
2. that the processing is necessary for the purposes of the legitimate interests pursued by us, including but not limited to, the sale of products and services to your organisation through the Website or the conduct of direct marketing activities.

7. **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

1. **Submitted Information**. We use this information:

(a) to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

(b) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

(c) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you;

(d) to notify you about changes to the Website or our services; and

(e) to ensure that content from the Website is presented in the most effective manner for you and for your computer.

2. **Technical Information**. We use this information:

(a) to administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

(b) to improve the Website to ensure that content is presented in the most effective manner for you and for your computer;

(c) to allow you to participate in interactive features of the Website, when you choose to do so;

(d) as part of our efforts to keep the Website safe and secure;

(e) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and

(f) to make suggestions and recommendations to you and other users of the Website about goods or services that may interest you or them.

3. **Third Party Information**. We will combine this information with Submitted Information and Technical information, and use it for the purposes set out above (depending on the types of information we receive).

4. **Special provisions concerning marketing**. This paragraph applies where we use your Submitted Information to provide you or permit selected third parties to provide you, with information about goods or services we feel may interest you:

(a) If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you.

(b) If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

(c) If you are content for us to use your data in this way, and to pass your details on to third parties for marketing purposes, please tick the relevant box(es) on the registration or enquiry form on which we collect your data.

8. **DISCLOSURE OF YOUR INFORMATION**
    1. You agree that we have the right to disclose your personal information to selected third parties, including:

(a) business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;

(b) advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.

2. You agree that we have the right to disclose your personal information to any member of Volution Group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

3. You agree that we have the right to disclose your personal information to third parties:
    1. if we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
    2. if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
    3. if we believe in good faith that we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request; and
    4. if we require to do so in order (a) to enforce or apply (i) our Terms and Conditions of Sale, and (ii) any terms and conditions of supply or other agreements that we have with you; or (b) to protect the rights, property, or safety of Volution Group, our customers, or others (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

9. **WHERE WE STORE YOUR PERSONAL DATA**
    1. Any personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.
    2. All information you provide to us is stored securely. Our secure servers use Secured Sockets Layer technology. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
    3. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website, and any such transmission is at your own risk. Once we have received your information, we will try to prevent unauthorised access by means of procedures and security features consistent with good industry practice.
    4. Please note also that clicking on links, banner advertisements or RSS feeds may result in you being transferred to other websites that are not within our control, and which may be subject to different policies (or no policies) regarding data privacy. It is your responsibility to check that the other website has an appropriate privacy policy, in order to ensure that you agree with use of your personal data by the data controllers of any such other website. We have no control over, and accept no responsibility for, any such third party websites, links, advertisements or feeds; or for the use that is made of any personal data about you that may be gathered as a result of your use of them.

10. **YOUR RIGHTS AS A DATA SUBJECT**
    1. This Section 10 sets out the rights that you have as a data subject, by reason of the General Data Protection Regulation.
    2. You have the following rights:
        1. The right to request access to the personal data that we hold about you;
        2. The right to request rectification of the personal data that we hold about you;
        3. The right to request erasure of the personal data that we hold about you;
        4. The right to request restriction of processing about you;
        5. The right to object to processing; and
        6. The right to data portability.

You can find more details about the above rights by going to the ICO website which is at https://ico.org.uk/. If you wish to invoke any of the above rights, please notify our Data Protection Officer, using the contact details set out in Section 2 above. Please include the words DATA PROTECTION QUERY in the subject line of your email, or at the top of your letter.

3. Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify our Data Protection Officer using the contact details set out in Section 2 above. Please include the words DATA PROTECTION QUERY in the subject line of your email, or at the top of your letter.
4. You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at https://ico.org.uk/global/contact-us/

-ends-

Cookie Policy

What are cookies and why do we use them?

Cookies are small text files that are created and stored on your browser or the hard drive of your device by websites that you visit to enable the website to proactively operate and â??rememberâ?? who you are. They are also used to monitor website traffic. Cookies are generally only visible to the website that serves them and not to other websites.

Our cookies are used on our website to â??rememberâ?? information so that it can be passed from page to page and to collect website statistics. This statistical data may be used to help improve our websites, offers and the services that we offer to you. Some of our cookies will also recognise you as a previous visitor the next time you visit our websites to improve your experience â?? if you have consented to be remembered.

Cookie types explained:

There are two types of Cookie:
Session Cookies - These cookie files are erased when you close your browser. This cookie stores your browsing information and will be active until you leave a site and close your browser.
Persistent Cookies - These files stay in one of a browser's subfolder until they are deleted manually or your browser deletes them based on the duration period contained within the persistent cookie's file. You can set your browser to automatically remove these cookies on logging off.

Our use of cookies

We may use cookies for:

Social Sharing: Enabling you to share Volution Group stories and page content via social media components, like Facebook and Twitter.

Analytics: We like to anonymously keep track of user behaviour to help us keep our website content relevant and up to date. It's also useful to identify trends of how people navigate through our websites.

How to manage cookies

- You can adjust your cookie preferences by adjusting your browser so that it notifies you when cookies are sent to it, or you can refuse cookies altogether. The Help function within your browser should explain how to do this. Alternatively, you may visit www.aboutcookies.org or www.allaboutcookies.org, to obtain detailed information on how to prevent cookies from being set on your particular browser.
- If you want to clear all cookies left behind by the websites you have visited, please refer to your browser manufacturer's instructions by clicking "Help" in your browser menu. Alternatively, you may visit www.aboutcookies.org or www.allaboutcookies.org, to obtain detailed information on how to prevent cookies from being set on your particular browser.
- Please note that by deleting or disabling browser cookies, you may not be able to use certain areas or features of our website.

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