



## PRIVACY POLICY

### Introduction

This Privacy Policy outlines Smart Secure Ltd ("we", "our" or "the Company") practices with respect to information collected from users who access our website at [www.smartsecureltd.co.uk](http://www.smartsecureltd.co.uk) ("Site") or otherwise share personal information with us (collectively: "Users").

Responsible authority within the meaning of data protection laws, in particular the General Data Protection Regulations (GDPR): Information Commissioner's Office

### User Rights

You may request to:

1. Receive confirmation as to whether or not personal information concerning you is being processed and access your stored personal information, together with supplementary information.
2. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
3. Request rectification of your personal information that is in our control.
4. Request erasure of your personal information.
5. Object to the processing of personal information by us.
6. Request to restrict processing of your personal information by us.
7. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements.

If you wish to exercise any of the above rights or receive more information, please contact our Data Protection Officer ("DPO") using the details provided below:

[info@smartsecureltd.co.uk](mailto:info@smartsecureltd.co.uk)

### Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable opportunity. Under applicable regulations, we will keep records containing client personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

### Grounds for data collection

Processing of your personal information (i.e. any information which may potentially allow your identification through reasonable means; hereinafter "Personal Information") as is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use the Site, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

We encourage our Users to carefully read the Privacy Policy and use it to make informed decisions.



## What information do we collect?

We collect two types of data and information from Users.

The first type of information is unidentified and non-identifiable information pertaining to a User(s), which may be made available or gathered via your use of the Site ("Non-personal Information"). We are not aware of the identity of a User from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our Site. We may also collect information on your activity on the Site (e.g. pages viewed, online browsing, clicks, actions, etc.).

The second type of information Personal Information, which is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual. Such information includes:

- **Device Information:** We collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Site.
- **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.

## How do we receive information about you?

We receive your Personal Information from various sources:

- When you voluntarily provide us with your personal details in order to register on our Site;
- When you use or access our Site in connection with your use of our services;
- From third-party providers, services and public registers (for example, traffic analytics vendors).

## How is the information used? With whom do we share the information?

We do not rent, sell or share Users' information with third parties, except as described in this Privacy Policy.

We may use the information for the following:

- Communicating with you – sending you notices regarding our services, providing you with technical information and responding to any customer service issue you may have;
- To communicate with you and to keep you informed about our latest updates and services;
- For statistical and analytical purposes, intended to improve the Site.
- To register you as a new customer
- To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy or (b) Asking you to leave a review or take a survey
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
- To make suggestions and recommendations to you about goods or services that may be of interest to you

In addition to the different uses listed above, we may transfer or disclose Personal Information to our subsidiaries, affiliated companies and subcontractors.

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our trusted third-party providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- Hosting and operating our Site;
- Providing you with our services, including providing a personalised display of our Site;
- Storing and processing such information on our behalf;
- Serving you with advertisements and to assist us in evaluating the success of our advertising campaigns and help us retarget any of our users;
- Providing you with marketing offers and promotional materials related to our Site and services;
- Performing research, technical diagnostics or analytics;
- Technical Data from the following parties: (a) analytics providers such as Google based outside the EU; (b) advertising networks; and (c) search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators such as Creditsafe.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

We may also disclose information if we have good reason to believe that disclosure of such information is helpful or reasonably necessary to:

- (i) comply with any applicable law, regulation, legal process or governmental request;
- (ii) enforce our policies (including our Agreement), including investigations of potential violations thereof;
- (iii) investigate, detect, prevent or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;
- (iv) to establish or exercise our rights to defend against legal claims;
- (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or
- (vi) for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

## **Cookies**

We and our trusted partners use cookies and other technologies in our related services, including when you visit our Site or access our services.

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are very helpful and can be used for various different purposes.

These purposes include allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and our Services quicker and easier. Cookies are also used to help make sure that the advertisements you see are relevant to you and your interests and to compile statistical data on your use of our Services.

The Site uses the following types of cookies:

1. 'session cookies', which are stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed;
2. 'persistent cookies', which are read only by the Site, saved on your computer for a fixed period and are not deleted when the browser is closed. Such cookies are used where we need to know who you are for repeat visits, for example to allow us to store your preferences for the next sign-in;
3. 'third-party cookies', which are set by other online services who run content on the page you are viewing, for example by third-party analytics companies who monitor and analyse our web access.



Cookies do not contain any information that personally identifies you, but Personal Information that we store about you may be linked, by us, to the information stored in and obtained from cookies. You may remove the cookies by following the instructions of your device preferences; however, if you choose to disable cookies, some features of our Site may not operate properly, and your online experience may be limited.

We use a tool which is based on the [Snowplow Analytics](#) technology to collect information about your use of the Site. The tool collects information such as how often users access the Site, which pages they visit when they do so, etc. The tool does not collect any Personal Information and is only used by our Site hosting and operating service provider to improve the Site and services.

### Use of script libraries (Google Web Fonts)

In order to present our contents correctly and make them graphically appealing across all browsers, we use script libraries and font libraries such as Google Web Fonts (<https://www.google.com/webfonts>) on this website.

Google Web Fonts are transferred to your browser's cache to avoid multiple loading. If your browser does not support Google Web Fonts or does not allow access, content will be displayed in a default font.

- Calling script libraries or font libraries automatically triggers a connection to the library operator. In theory, it is possible – but currently also unclear whether and, if so, for what purposes – that operators of corresponding libraries collect data.
- The privacy policy of the library operator Google can be found here: <https://www.google.com/policies/privacy>.

### Third-party collection of information

Our policy only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them.

Accordingly, we encourage you to read the terms and conditions and privacy policy of each third party that you choose to disclose information to.

This Privacy Policy does not apply to the practices of companies that we do not own or control, nor to individuals whom we do not employ or manage, including any of the third parties which we may disclose information to as set out in this Privacy Policy.

### How do we safeguard your information?

We take great care in implementing and maintaining the security of the Site and your information by employing industry standard procedures and policies to ensure the safety of the information we collect and retain, preventing unauthorised use of any such information, and requiring any third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorised access or abuse our Site, and we make no warranty, express, implied or otherwise, that we will prevent such access.

### Transfer of data outside the EEA

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

### Marketing

We may use your Personal Information such as your name, email address, telephone number, etc., ourselves or by using our third-party subcontractors, for the purpose of providing you with promotional materials concerning our services which we believe may interest you.

To respect your right to privacy, within such marketing materials we provide you with the means to opt out of receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important email communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

### **Corporate transaction**

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

### **Minors**

We understand the importance of protecting children's privacy, especially in an online environment. The Site is not designed for or directed at children. Under no circumstances shall we allow the use of our services by minors without prior consent or authorisation by a parent or legal guardian. We do not knowingly collect Personal Information from minors.

If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at [info@smartsecureltd.co.uk](mailto:info@smartsecureltd.co.uk).

### **Updates or amendments to this Privacy Policy**

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised Privacy policy. The last revision will be reflected in the "Last modified" section. Your continued use of the Platform, following the notification of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

### **How to contact us**

If you have any general questions about the Site or the information, we collect about you and how we use it, you can contact us at [info@smartsecureltd.co.uk](mailto:info@smartsecureltd.co.uk).