

# Pexa Privacy policy

Pexa Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use stated on our website and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.pexa.com](http://www.pexa.com) you are accepting and consenting to the practices described in this policy.

For the purposes of the General Data Protection Regulation 2016 and the Data Protection Act 2017 and the regulations made under them (the **DP Law**), the data controller is Pexa Ltd of 2 Bordon Trading Estate, Old Station Way, Bordon, Hants GU35 9HH.

Our nominated data protection compliance manager for the purpose of the DP Law is Nick Robins, Finance Director.

## **INFORMATION WE COLLECT FROM YOU**

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our site [www.pexa.com](http://www.pexa.com) or other websites operated by us (**our site**) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, open an account with us, subscribe to our service, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, or when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph, or other factual information about you or your business
- **Information we collect about you.** With regard to each of your visits to our site we will automatically collect the following information:
  - technical information, including 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.
  - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (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.

- **Information we receive from other sources.** This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

## **COOKIES**

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

## **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from any contract entered into between you and us and to provide you with the information, products and services that you request from us;
  - 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;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. 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. 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. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form **or** registration form);
  - to notify you about changes to our products or services;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical, accounting and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

- to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).
  - **Failure to provide personal information.** Where we require personal information in order to be able to enter into a contract with you, or to perform a contract, your failure to supply the information will prevent the effecting or performance of the contract and we will have no liability for any loss which results from the failure to supply the required data.
  - **How long we will hold the information.** We will hold the information for the processing of any information required for any contract we have with you and for a reasonable period thereafter. We will review the information held on a periodic basis and delete information which we assess will no longer be required for any future dealings between you and us.

#### **DISCLOSURE OF YOUR INFORMATION**

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties including:
  - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
  - advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
  - analytics and search engine providers that assist us in the improvement and optimisation of our site;
  - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that 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.
- If the shares of Pexa Ltd or an associated company or substantially all of their assets are acquired by a third party, in which case personal data held about its customers will be one of the transferred assets.
- If required in connection with the obtaining of any professional or other advice from any third parties;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Pexa Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area ("EEA"). It will also be processed by staff operating inside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support or other 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 policy.

- If in the future your personal data is transferred by us outside the EEA for processing or storage, we will ensure that any such transfer is made in accordance with the requirements of the DP Law.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, in accordance with good business practice, we cannot guarantee the security of your data transmitted to our site at all times; any transmission is at your own risk. Once we have received your information, we will put in place and apply strict procedures and security features to try to prevent any unauthorised third party access.

#### **YOUR RIGHT TO OBJECT TO DATA PROCESSING**

You have the right to ask us not to process your personal data for marketing or any other purposes at any time. We will usually inform you (before collecting your data) if we intend to use your data for marketing purposes or if we intend to disclose your information to any third party for any marketing or similar purposes.

You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right to prevent processing at any time at any time by contacting us the Data Protection Compliance Manger at Unit 2, Bordon Trading Estate, Old Station Way, Bordon GU35 9HH.

However, we have the right to continue to process the information where we have compelling legal grounds to do so or if the processing is required by us in connection with legal claims.

Our site 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 have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### **ACCESS TO INFORMATION**

The DP Law gives you the right to access information held about you. Your right of access can be exercised in accordance with the DP Law.

#### **RECTIFICATION**

The DP Law also gives you the right to require your personal data held by us to be rectified if it is inaccurate or incomplete. Your right of access can be exercised in accordance with procedures stated in the DP Law.

#### **ERASURE**

Under the DP Law you may in some circumstances be entitled to have your personal information erased if the processing causes unwarranted and substantial damage or distress. You should notify our data controller of the relevant circumstances in accordance with the DP Law if you wish to exercise this right.

#### **RESTRICTION OF PROCESSING**

Under the DP Law you may in some circumstances also be entitled to restrict or block our processing of your personal information. You should notify our data controller of your request and the relevant circumstances in accordance with the DP Law if you wish to exercise this right.

#### **DATA PORTABILITY**

The DP Law gives you the right to obtain and reuse your personal data held by us to another IT environment. If you notify us that you wish to exercise this right, we will arrange the transfer

in machine readable form to another IT environment within one month if it is technically possible, or within two months if the transfer is complex or if there have been multiple requests.

#### **AUTOMATED DECISION MAKING**

You also have the right under the DP Law in some circumstances not to be the subject of a decision based on automated processing or profiling which produces a legal effect or other significant effect on you. If you wish to exercise this right, you should make an objection in accordance with the provisions of the DP Law.

#### **CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### **COMPLAINTS**

If we have committed any infringement of the DP Law, you have the right to lodge a complaint with the relevant regulatory authority in the United Kingdom. The details of the regulator are as follows:

Information Commissioner's Office

<https://ico.org.uk/concerns/>

**Address:** Wycliffe House, Water Ln, Wilmslow SK9 5AF

**Phone:** 0303 123 1113

#### **CONTACTS**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Data Protections Compliance Manager at Graytone Ltd, Unit 2, Bordon Trading Estate, Old Station Way, Bordon GU35 9HH.

Issue: 1

Dated: 15.1.2018