# Website Privacy Notice

This is the privacy notice of A of E Ltd

In this document, "we", "our", or "us" refer to A of E Ltd. Our registered office is at 561a Lanark Road, Edinburgh, EH14 5DE

## **Introduction**

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

2. We regret that if there are one or more points below with which you are not happy with, please leave our website immediately.

3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.

4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

5. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

6. The law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data. We do this now, by requesting that you read the information provided at <u>www.knowyourprivacyrights.org</u>

7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

# The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data. If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. Information we process because we have a contractual obligation with you

When you buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

To carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information. We may use it to:

- 1.1. verify your identity for security purposes
- 1.2. sell products to you
- 1.3. provide you with our services

1.4. provide you with suggestions and advice on products and services. We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply. Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful. We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at a.of.e@hotmail.co.uk

**3**. Information we process for the purposes of legitimate interests we may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having considered:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would consider it reasonable to do so eg, we may process your data on this basis for the purposes of:
- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

## 4. Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

5. Complaints regarding content on our website If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate. If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

**6.** Information relating to your method of payment. Payment information is never taken by us or transferred to us either through our website.

#### 7. Job application and employment

If you send us information in connection with a job application, we may keep it for up to one year in case we decide to contact you later. If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

#### 8. Sending a message to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us to reply with the information you need. We record your request and our reply to increase the efficiency of our business. We keep personally identifiable information associated with your message, such as your name and email address to be able to track our communications with you to provide a high-quality service.

**9.** Complaining. When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

**10.** Affiliate and business partner information. This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us. The information is not used for any other purpose. We undertake to preserve the confidentiality of the information and of the terms of our relationship. We expect any affiliate or partner to agree to reciprocate this policy.

**11**. Information we obtain from third parties. Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

12. Third party advertising on our website Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website. They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts. We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

# Access to your own information

**13.** Removal of your information. If you wish us to remove personally identifiable information from our website, you may contact us at <u>a.of.e@hotmail.co.uk</u>

**14**. Verification of your information. When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

15. How you can complain

15.1. If you are not happy with our privacy policy or if you have any complaint, then you should tell us by email. Our address is <u>a.of.e@hotmail.co.uk</u>

15.2. If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

15.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at https://ico.org.uk/concerns/

**16**. Retention period for personal data. Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

16.1. to provide you with the services you have requested;

16.2. to comply with other law, including for the period demanded by our tax authorities;

16.3. to support a claim or defence in court.

**17**. Review of this privacy policy. We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records. If you have any question regarding our privacy policy, please contact us.