6 Richmond Terrace
Stoke-on-Trent, Staffs, ST1 4ND
info@astec-at.co.uk
www.astec-at.co.uk
01782 79 22 22

# Astec Privacy Policy

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## 1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors and service users.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

1.4 In this policy, "we", "us" and "our" refer to Astec Assistive Technology Solutions Ltd.

1.5 To summarise our data retention:

(a) We hold information until a time that it isn't necessary, or we are asked to remove or delete it via an identifiable person or Government organisation.
(b) We do not share information regarding persons, service users, website visitors or contracts.
(c) All data is securely held and where possible is encrypted, especially during any transit.

## 2. How we use your personal data

2.1 In this Section 2 we have outlined:

(a) The general categories of personal data that we may process;
(b) The purposes for which we may process personal data; and
(c) The legal bases of the processing.

2.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics and you can find out more about Google's data practices from their website. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

2.3 We may process your account data ("account data"). The account data may include your email address and password. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and the performance of contracts between you and us.

2.4 We may process your personal data that are provided in the course of the use of our services ("service data"). The service data may include your name, address, telephone number, email address. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and the performance of contracts between you and us.

2.5 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, payment card/account details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The source of the transaction data is you and your banking provider. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

2.6 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The source of the notification data is you. The legal basis for this processing is the performance of a contract between you and us, our legitimate interests to keep you up to date about and informed, and for marketing.

2.7 We may process information contained in, or relating to, any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. The source of correspondence data is you and our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website/business and communications with users.

2.8 We may process your visa data ("visa data"). The visa data may include your name, card number, purchases made and email address. The source of the visa data is your purchases. The visa data may be processed for the purposes of operating our website, providing our services and communicating with you. The legal basis for this processing is our legitimate


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interests, namely the proper administration of our website and business and the performance of contracts between you and us.

2.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.10 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 3. Providing your personal data to others

3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.2 We may disclose your personal data such as name, phone number, name and address to third-party intermediaries such as DHL, Parcel Force, Royal Mail etc insofar as reasonably necessary for the purposes of fulfilling our contract with you, and on the legal basis, set out in this policy.

3.3 Financial transactions relating to our website and services are handled by our payment services providers, such as PayPal, World Pay and SAGE Pay. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices on their websites.

3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.5 On certain pages on our website you will see ‘share’ or ‘social buttons’. These enable you to share or bookmark pages on our website. These may include buttons for: Twitter, LinkedIn, Pinterest, Facebook, Instagram or other social platforms. In order for us to implement these buttons on our website and connect them to the relevant social networks and external sites, there are scripts that are executed from domains owned by third-parties and outside of our control. You should be aware that these sites are likely to be collecting


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information about what you are doing all around the internet, including on our website. By clicking on any of these buttons, these sites will be registering that action and may use that information. In some cases, these sites will be registering the fact that you are visiting our website and the specific pages you are on, even if you don't click on the button but are already or automatically logged into their services, like Google and Facebook. We recommend that you check the respective policies of each of these sites to see how exactly they use your personal information and to find out how to opt out, or delete, such personal information.

3.6 Our website and our database are hosted by a third-party partner within the EEA, who is obliged to take security measures regarding personal data. All personal data you provide to us or we receive about you is stored on secure servers. Where practical and reasonable we encrypt communication between our website and you using Secure Socket Layer/Transport Layer Security technology. We may also use encryption at rest and other technologies where reasonable to secure your personal data. 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 our website and any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access and we apply a "Privacy by Design" approach to our personal data handling and assessment procedures. Our current hosting partner is: 123-reg, a UK based company, registration number: 08107222.

## 4. Retaining and deleting personal data

This Section (4) sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

4.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.2 We will retain your personal data if you are or have been a customer or client of our products or services until asked otherwise. This allows us to reference our previous contact with you to assist with our future services or products to you.

4.3 The above retention policy applies to the type of data captured at the date of this policy. If we start to capture any additional data in the future we will amend this policy and update you accordingly.

4.4 Notwithstanding the provision of Section 4, we may retain your personal data beyond the period specified in our retention policy where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.


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## 5. Amendments

5.1 We may update this policy from time to time by publishing a new version on our website.

5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## 6. Your rights

In this Section (6), we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

6.1 Your principal rights under data protection law are:

(a) the right to access;
(b) the right to rectification;
(c) the right to erasure;
(d) the right to restrict processing;
(e) the right to object to processing;
(f) the right to data portability;
(g) the right to complain to a supervisory authority; and
(h) the right to withdraw consent.

6.2 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. However, we cannot release your personal information to anyone; we can only release your personal information to you – it's a legal requirement. Therefore, it is important for us to ensure that we confirm your identity before we can release any personal information. If you send us a request to provide you with a copy of your personal information, then we may ask you to provide some identification. We may ask you to provide a copy of your current and valid passport and/or driving licence plus a utility bill (that is no more than 3 months old) and has your current address. We have an obligation to protect your personal data and we need to ensure that it is being released to the correct person.

6.3 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data regarding you, completed.


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6.4 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

6.5 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

6.6 You have the right to object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

6.7 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

6.8 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

6.9 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.


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6.10 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

6.11 You may exercise any of your rights in relation to your personal data by written notice to us or by emailing our data protection officer: Simon Pool (privacy@astec-at.co.uk).

## 7. About cookies

7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

7.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

7.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

7.4 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website. You may also delete any cookies stored on your computer at any time. You can find out more about changing cookie settings on your computer by visiting http://www.allaboutcookies.org/manage-cookies/.

## 8. Cookies that we use

8.1 We use cookies for the following purposes:

(a) status - we use cookies to help us to determine if you are logged into our website.

(b) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.

(c) analysis - we use cookies to help us to analyse the use and performance of our website and services.

## 9. Cookies used by our service providers

9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.


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9.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google Analytics's privacy policy is available from their website.

## 10. Managing cookies

10.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.

10.2 Blocking all cookies will have a negative impact upon the usability of many websites.

10.3 If you block cookies, you may not be able to use all the features on our website.

10.4 Find out more about changing cookie settings on your computer by visiting http://www.allaboutcookies.org/manage-cookies/.

## 11. Our details

11.1 This company and its website are owned and operated by Astec Assistive Technology Solutions Ltd.

11.2 We are registered in England and Wales under registration number 08107222, and our registered office is at 6, Richmond Terrace, Stoke-On-Trent, Staffordshire, ST1 4ND

11.3 Our principal place of business is at Victoria House 8, Richmond Terrace, Stoke-On-Trent, Staffordshire, ST1 4ND

11.4 We can be contacted:
(a) by post, to the postal address given above;
(b) by telephone, on +44 (0)1782 792 222;
(c) by email, using: privacy@astec-at.co.uk

## 12. Data protection officer

12.1 Our data protection officer's contact details are: Simon Pool (privacy@astec-at.co.uk)


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