

WEBSITE PRIVACY POLICY

1. INTRODUCTION

- 1.1 Welcome to Ultimo Electronics Limited's privacy policy.
- 1.2 Ultimo Electronics respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2. PURPOSE OF THIS PRIVACY POLICY

- 2.1 This privacy policy aims to give you information on how Ultimo Electronics collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product.
- 2.2 This website is not intended for children and we do not knowingly collect data relating to children.
- 2.3 It is important that you read this privacy policy together with any other privacy information we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

3. CONTROLLER

- 3.1 Ultimo Electronics is the controller and responsible for your personal data.
- 3.2 We are registered with company number 08955668 and our registered office is at Unit B, Vulcan Road North, Norwich, Norfolk NR6 6AQ.
- 3.3 If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

4. CONTACT DETAILS

- 4.1 If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:
 - 4.1.1 sending us an email to websales@ultimoelectronics.co.uk
 - 4.1.2 completing the form at <https://ultimoelectronics.co.uk/contact/>; or
 - 4.1.3 by phoning us on 01508 500242.

4.2 You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

5. **Changes to the privacy policy and your duty to inform us of changes**

5.1 We keep our privacy policy under regular review.

5.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

6. **THIRD-PARTY LINKS**

6.1 This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, plug-ins or applications and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

7. **THE DATA WE COLLECT ABOUT YOU**

7.1 **Personal Data**, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

7.2 We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

7.2.1 **Identity Data** includes details such as your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;

7.2.2 **Contact Data** includes your billing address, delivery address, email address and telephone numbers;

7.2.3 **Financial Data** includes your bank account and payment card details;

7.2.4 **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us;

7.2.5 **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;

- 7.2.6 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
- 7.2.7 **Usage Data** includes information about how you use our website and products; and
- 7.2.8 **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

7.3 We do not collect any special categories of Personal Data about you, this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. Further, we collect any information about criminal convictions and offences.

8. **IF YOU FAIL TO PROVIDE PERSONAL DATA**

8.1 Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods). In this case, we may have to cancel orders which you have placed for our products but we will notify you if this is the case at the time.

9. **HOW IS YOUR PERSONAL DATA COLLECTED?**

9.1 We use different methods to collect data from and about you including through:

9.1.1 **direct interactions**, in which you may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us through our website such as when you order our products, create an account on our website or give us feedback or contact us;

9.1.2 **automated technologies or interactions** will automatically collect Technical Data about your equipment, browsing actions and patterns and we collect this Personal Data by using cookies and other similar technologies, also we may receive Technical Data about you if you visit other websites employing our cookies (please see our cookie policy for further details; and

9.1.3 **third parties sources** from which we may receive Personal Data about you from various third parties including:

9.1.3.1 Technical Data from analytics providers such as Google; and

9.1.3.2 Contact, Financial and Transaction Data from providers of technical, payment and delivery service providers we use to operate our website, take payments and deliver goods.

10. HOW WE USE YOUR PERSONAL DATA

10.1 We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

10.1.1 where we need to perform the contract we are about to enter into or have entered into with you;

10.1.2 where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and

10.1.3 where we need to comply with a legal obligation.

10.2 Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

11. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

11.1 The table below sets out a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer.	(a) Identity; and (b) Contact.	Performance of a contract with you.
To process and deliver your order including: (a) managing payments, fees and charges; and	(a) Identity; (b) Contact; (c) Financial; and (d) Transaction.	(a) Performance of a contract with you; and (b) necessary for our legitimate interests (to recover debts due to us).

(b) collecting and recovering money owed to us.		
<p>To manage our relationship with you which will include:</p> <p>(a) notifying you about changes to our any applicable terms or our privacy policy; and</p> <p>(b) asking you to leave a review or take a survey.</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Profile; and</p> <p>(d) Marketing and Communications.</p>	<p>(a) Performance of a contract with you;</p> <p>(b) necessary to comply with a legal obligation;</p> <p>(c) necessary for our legitimate interests (to keep our records updated and to study how customers use our products).</p>
<p>To enable you to partake in a prize draw, competition or complete a survey.</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Profile;</p> <p>(d) Usage; and</p> <p>(e) Marketing and Communications.</p>	<p>(a) Performance of a contract with you; and</p> <p>(b) necessary for our legitimate interests (to study how customers use our products, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>(a) Identity;</p> <p>(b) Contact; and</p> <p>(c) Technical.</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); and</p> <p>(b) necessary to comply with a legal obligation.</p>
<p>To use data analytics to improve our website, products, marketing, customer relationships and experiences.</p>	<p>(a) Technical; and</p> <p>(b) Usage.</p>	<p>Necessary for our legitimate interests (to define types of customers for our products, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>

<p>To send you emails with suggestions and recommendations about goods that may be of interest to you.</p>	<p>(a) Identity; (b) Contact; (c) Technical; (d) Usage; (e) Profile; and (f) Marketing and Communications.</p>	<p>Necessary for our legitimate interests (to develop our products and grow our business).</p> <p>If you have not previously purchased goods through our site we will only send you such communications with your consent e.g., when you have asked to be added to our marketing list.</p>
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12. PROMOTIONAL OFFERS FROM US

- 12.1 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and offers may be relevant for you (we call this marketing).
- 12.2 You may receive marketing communications from us if you have requested information from us or purchased goods from us and you have not opted out of receiving that marketing.

13. THIRD-PARTY MARKETING

- 13.1 We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

14. OPTING OUT

- 14.1 You can ask us or third parties to stop sending you marketing messages at any time. You can use the unsubscribe link at the bottom of our marketing e-mails to do this.
- 14.2 Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product purchase, warranty registration or other transactions you have made with us.
- 14.3 If you opt out of receiving marketing messages, we will retain as much of your Personal Data as we require to ensure that we do not send you such messages in future.

15. **COOKIES**

15.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

16. **CHANGE OF PURPOSE**

16.1 We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

16.2 If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

16.3 Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

17. **AUTOMATED DECISION MAKING AND PROFILING**

17.1 We will not use your Personal Data in order to undertake any form of automated decision making or profiling.

18. **DISCLOSURES OF YOUR PERSONAL DATA**

18.1 We may share your Personal Data with the third parties and for such purposes as set out below:

18.1.1 our website development, hosting and IT support providers who help us keep our website running;

18.1.2 our payment processing platform which we use to process your payments for our goods;

18.1.3 our delivery companies that deliver the goods which you purchase from us;

18.1.4 other third parties that provide us with the professional services we need to operate our business such as marketing consultants, lawyers and accountants;

18.1.5 regulatory and government bodies such as HMRC and the ICO; and

18.1.6 third parties to whom we may choose to sell, transfer or merge parts of our business or our assets, or; alternatively, we may seek to acquire other businesses or merge with them and if a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy policy.

18.2 We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

19. **INTERNATIONAL TRANSFERS**

19.1 We may share your Personal Data outside of the UK.

19.2 If we transfer your Personal Data out of the UK, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

19.2.1 we may transfer your personal data to countries that have been deemed to provide an adequate level of protection for Personal Data; or

19.2.2 where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

19.3 Please contact us if you want further information on where your Personal Data may be sent and the specific mechanism used by us when transferring your Personal Data out of the UK.

20. **DATA SECURITY**

20.1 We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

20.2 We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

21. DATA RETENTION

- 21.1 We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 21.2 To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 21.3 In some circumstances you can ask us to delete your data: see '*Your legal rights below*' for further information.
- 21.4 In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

22. YOUR LEGAL RIGHTS

- 22.1 Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Data:
- 22.1.1 request copies of the Personal Data that we hold about you;
 - 22.1.2 request that we correct any inaccuracies in the Personal Data that we hold about you;
 - 22.1.3 request that we erase the Personal Data that we hold about you;
 - 22.1.4 object to the way we use the Personal Data that we hold about you;
 - 22.1.5 restrict the way we use the Personal Data that we hold about you; and
 - 22.1.6 request that we transfer the Personal Data that we hold about you to someone else.
- 22.2 If you would like to exercise any of your rights in respect of your Personal Data please contact us using the details under section 1 of this policy.

23. **CONSENT**

23.1 Where we have obtained and are relying on your consent to process your Personal Data you may withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

24. **NO FEE USUALLY REQUIRED**

24.1 You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

25. **WHAT WE MAY NEED FROM YOU**

25.1 We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

26. **TIME LIMIT TO RESPOND**

26.1 We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.