

1. GENERAL

Enlightened Windows ("we") recognises that personal privacy is an important issue and we support the protection of your personal details and internet privacy as required by UK legislation.

This policy (together with our terms and conditions of business and any other documents referred to on it) explains what type of personal information will be gathered, how this information will be used, where it is stored and how you can access or request deletion of your personal data.

Personal information may be captured by the Enlightened Windows website, via telephone, email or data scanning at trade exhibitions. Personal information is neither captured nor stored without the prior consent of the individual.

We comply with current UK Data Protection Act 1998 (the Act) and from 25th May 2018 this will incorporate the General Data Protection Regulation (EU) 2016/679 ('GDPR').

For the purpose of current Data Protection Legislation the data controller is Enlightened Windows Limited, a company registered in England with company number 09667925, whose registered address is 1 Pinnacle Way, Pride Park, Derby, Derbyshire, DE24 8ZS, United Kingdom.

Data Protection law states that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Enlightened Windows Ltd. The law says we must have one or more of these reasons:

- To fulfil a contract, we have with you, or
- When it is in our legitimate interest, or
- When you consent to it

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Here is a list of all the ways that we may use your personal information and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are:

What we use your personal information for	Our reasons for doing so	Our legitimate interests	
 To manage our relationship with you or your business To develop new ways to meet our customers' needs and to grow our business To develop and carry out marketing activities To provide advice or guidance about our products and services 	 Your consent Fulfilling contracts Our legitimate interests 	 Keeping our records up to date, working out which of our products and services may interest you and telling you about them Developing products and services, and what we charge for them Seeking your consent when we need it to contact you 	
To develop and manage our products and services	 Fulfilling contracts 	Developing products and services and what we charge for them	



•	To manage how we work with other companies that provide services and products to us and our customers	•	Our legitimate interests	•	Being efficient about how we fulfil our contractual duties
•	To deliver our products and services To make and manage customer payments To collect and recover money that is owed to us	•	Fulfilling contracts Our legitimate Interests	•	Being efficient about how we fulfil our contractual duties
•	To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications and audit.	•	Our legitimate Interests	•	Complying with regulations that apply to us Being efficient about how we fulfil our legal and contractual duties
•	To exercise our rights set out in agreement or contracts	•	Fulfilling contracts		

2. COLLECTION AND USE OF PERSONAL DATA

Enlightened windows may collect and process personal information about you. You may give us information about yourself by filling in forms on our website <u>www.enlightenedwindows.co.uk</u> ("our website"), face to face at trade shows or by corresponding with us by telephone, email or otherwise. This includes information that you provide when you subscribe to our services, search for a product or place an order with us. The information you give us may include your name, postal address, email address, phone number and financial/credit card information. This will only be used for the purpose stated at the time i.e. to provide a service or product to you or for administrative purposes.

The information that you give to us will be used to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us. Your personal data may be shared with our manufacturers and/or logistics companies all of whom are based in the EEA.

We may use this personal data 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 (consent to such material can be withdrawn) or to notify you about changes to our services.

3. COLLECTION AND USE OF WEBSITE ACTIVITY DATA AND COOKIES

We use Google Analytics, as a web analytic service provided by Google. Google Analytics uses cookies, which are small text files placed on your computer, this helps us to analyse how users use our site (see item 4. for information about cookies). If you prefer to opt out from Google Analytics, Google provide a <u>Google Analytics opt-out tool</u> which allows you to specify that you don't want to accept their cookies, not just for our website, but for all sites which use Google Analytics.

Via Google Analytics we collect information about you with regard to each of your visits to our website. This includes the following:



Technical information: 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 website (including date and time); products you have viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouseovers), and methods used to browse away from the page and any phone number used to call our customer service number.

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 further information about cookies visit <u>www.aboutcookies.org</u> or <u>www.allaboutacookies.org</u>. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser.

We don't sell the information collected by cookies, nor do we disclose the information to third parties, except where required by law (for example to government bodies and law enforcement agencies).

We sometimes use Google AdWords Remarketing pixels to assist with our marketing and delivery of online advertising across the Internet, in particular on the Google Display Network. By better understanding what our audiences are interested in, we can more efficiently promote Enlightened Windows. The technology to do this is made possible by cookies and as such we may place a "remarketing cookie" during your visit.

AdWords remarketing will display ads to you based on what parts of our website you have viewed by placing a cookie on your web browser. This cookie does not in any way identify you or give access to your computer or mobile device. The cookie is used to indicate to other websites that "this person visited a particular page, so show them ads relating to that page." This way we can show you ads that are personalised to you.

If you do not wish to see personalised ads from Enlightened Windows you can opt out in several ways:

- 1. Opt out of Google's use of cookies by visiting Google's Ads Settings
- 2. Opt out of a third-party vendor's use of cookies by visiting <u>vouradchoices opt-out</u>.

Please note that opting out won't stop you seeing adverts, just that they won't be tailored specifically to you.

We use this information to help us administer our website and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes. This information helps us to improve our website to ensure that content is presented in the most effective manner for you and for your computer and as part of our efforts to keep our website safe and secure.



On our website there are links to relevant websites for other organisations. If you click on a link to an external site and leave our website, then you be subject to the privacy policy of that external organisation and not our privacy policy.

4. DISCLOSURE OF YOUR INFORMATION

We may disclose your information to 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 and conditions of business and other agreements.

In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. Or, if Enlightened Windows Ltd, or substantially all of its assets, are acquired by a third party, personal data held by it about its customers, will be one of the transferred assets.

We will not sell, license or trade your personal information to others. We do not provide your personal information to direct marketing companies or other such organisations.

5. STORAGE OF PERSONAL DATA

All information you provide to us is stored on our secure servers. The servers that we use are based in the USA and Ireland.

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. Therefore, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We will keep your information for as long as you have a relationship with Enlightened Windows. After it ends we will keep your information where we may need it for our legitimate purposes e.g. to help us respond to queries or complaints or for other reasons such as responding to requests from regulators.

6. ACCESS TO INFORMATION

The Act gives you the right to access information held about you. From May 25th 2018 under the provisions of Article 17 of the GDPR Legislation, you also have the right to request that any personal Data (notwithstanding those exemptions listed under Article 17, paragraph 3) be permanently deleted. Upon receipt of such a request we will take all reasonable steps to ensure that this is completed in an expeditious manner.

7. YOUR CONSENT

By submitting your personal information, you consent to the use of that information as set out in this policy.



8. YOUR RIGHTS

You have the right to unsubscribe from any promotional materials that we may send from time to time by way of email, SMS, post, phone or any other medium.

- **Right to Erasure** you have the right to request that your Personal Data is deleted (notwithstanding those exemptions allowed under GDPR and the current DPA).
- **Right to Rectification** you have the right to request that any incorrect Personal Data we hold about you is corrected, if that information is inaccurate or incomplete.
- **Right to Data Portability** you have the right to request a machine readable export of all Personal Data we hold about you.

You have the right to lodge a complaint. In the UK complaints can be lodged with the Information Commissioners office (ICO). More information about the ICO can be found on their website: www. ico.org.uk

9. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on the privacy page on our website and where appropriate you will be notified by email. Please check back frequently to see any updates or changes to our privacy policy.

10. CONTACT

If you have any questions or comments regarding this privacy policy then please contact us at <u>info@enlightenedwindows.co.uk</u>.