

SMAR-TECHNOLOGY LIMITED: PRIVATE POLICY STATEMENT LAST UPDATED MAY 2023

BACKGROUND:

Smar-Technology Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who trades with Smar-Technology Limited and/or visits our website www.infinity-lockdown.co.uk and/or any other such website as Smar-Technology Ltd may own, now or in the future, and we will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy will be assumed to have been given unless you notify Smar-Technology Limited by e-mail that you do not agree or accept this Privacy Policy. If you do not agree with and/or accept this Private Policy please e-mail info@smar-tech.co.uk

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account” means an account required to place orders with Smar-Technology Limited or to access and/or use certain areas and features of our website;

2. Information About Us

Smar-Technology Ltd Our Site is a limited company registered in England under company number 4244048

Registered address: 531, Denby Dale Road West, Calder Grove, Wakefield WF4 3ND Vat Registration Number: 852503147

3. What Does This Policy Cover?

This Privacy Policy applies to any and all aspects of trade relating the products/services that we offer including those products and services accessed via our website.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious

information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a. The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 14.
- b. The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 14 to find out more.
- d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 14 to find out more.
- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 14.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6. What Data Do We Collect?

Depending upon your use of our website/products/services, we may collect some or all of the following personal and non-personal data

- a. Name;
- b. Date of birth;
- c. Gender;
- d. Address;
- e. Email address;
- f. Telephone number;
- g. Payment information;
- h. Information about your preferences and interests.

- i. IP address;
- j. Web browser type and version;
- k. Operating system;
- l. A list of URLs starting with a referring site, your activity on our Site, and the site you exit to;

7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will or may be used for one of the following purposes:

- a. Providing and managing your Account;
- b. Providing and managing your access to our website/products/services.
- c. Personalising and tailoring your experience of products/services.
- d. Supplying our products/services to you. Your personal details are required in order for us to enter into a contract with you.
- e. Personalising and tailoring our products/services for you.
- f. Communicating with you. This may include responding to emails or calls from you.
- g. Supplying you with information by email/post that you (you may unsubscribe or opt-out at any time by contacting us at info@smar-tech.co.uk)
- h. Analysing your use of our site/product/services and gathering feedback to enable us to continually improve these and your user/customer experience.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and post with information, news, and offers on our products/services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

9. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

10. Do You Share My Personal Data?

We will not share any of your personal data, without your permission, with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might

include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. How Can I Control My Personal Data?

In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via our site or when using our services, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (you may at any time opt-out of receiving unsolicited marketing e-mails from us by e-mailing us at info@smar-tech.co.uk)

12. Can I Withhold Information?

To use all features and functions that we have available as services and on this site you may be required to submit or allow for the collection of certain data.

13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 14.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of the Legal Department):

Email address: info@smar-tech.co.uk.

Postal Address: 8, Chestnut Avenue, Walton, Wakefield WF2 6TE

15. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our site and we therefore recommend that you check this page regularly to keep up-to-date.