

## REELTECH Privacy Policy

Date: 04.06.2018

REEL TECH UK LIMITED of Unit 1 Mere Farm Business Complex, Hannington, Red House Lane, Northampton, NN6 9FP ("we", "us" or "our") is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998, the General Data Protection Regulations 2016 and any and all other applicable laws and regulations relating to the processing of personal data and privacy ("the Data Protection Legislation"), we act as the data controller. Our nominated representative for the purpose of the Data Protection Legislation is Karl Willson or in his absence David Willson.

### **1. INFORMATION WE MAY COLLECT FROM YOU**

**1.1.** We may collect and process the following data about you:

**1.1.1.** Information that you provide by filling in forms on our site [www.reeltechuk.com](http://www.reeltechuk.com) (our "site"). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our site;

**1.1.2.** If you contact us, we may keep a record of that correspondence;

**1.1.3.** If you to complete surveys that we use for research purposes (although for the avoidance of doubt you do not have to respond to such surveys), the information which you provide in response to that survey;

**1.1.4.** Details of transactions you carry out through our site and of the fulfilment of your orders;

**1.1.5.** Information which you provide to us for the purposes of, or during the course of, our providing any services to you. Please note if this information is not provided we may be unable to provide you with the requested services or continue with the services currently be provided; and

**1.1.6** Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

## **2. IP ADDRESSES AND COOKIES**

**2.1** We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

**2.2** For the same reason as detailed on clause 2.1, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us to:

**2.2.1** Estimate our audience size and usage pattern;

**2.2.2** Store information about your preferences, and so allow us to customise our site according to your individual interests;

**2.2.3** Speed up your searches; and

**2.2.4** Recognise you when you return to our site.

**2.2.5** You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

**2.3** For more detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

**2.4** Please note that our advertisers may also use cookies, over which we have no control.

## **3. WHERE WE STORE YOUR PERSONAL DATA**

**3.1.** The data that we collect from you may be transferred to, and may be stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and that it is subject to appropriate safeguards, a copy of which can be provided by sending a request to REEL TECH UK LIMITED of Unit 1 Mere Farm Business Complex, Hannington, Red House Lane, Northampton, NN6 9FP.

**3.2.** All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

**3.3.** 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 site; 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.

#### **4. USES MADE OF THE INFORMATION**

**4.1.** We use information which we collect and hold about you in the following ways:

**4.1.1.** To ensure that content from our site is presented in the most effective manner for you and for your computer in accordance with our legitimate interests;

**4.1.2.** To provide you with information, products or services that you request from us or which we feel may interest you, where you have expressly consented to be contacted for such purposes. You may unsubscribe at any time from receiving further communications from us for these purposes;

**4.1.3.** To carry out our obligations arising from any contracts entered into between you and us as is necessary for the performance of our contract with you or to take steps at your request prior to entering into such a contract;

**4.1.4.** To allow you to participate in interactive features of our service, when you choose to do so in accordance with our legitimate interests;

**4.1.5.** To maintain, manage and improve our service either ourselves or via third party suppliers in accordance with our legitimate interests;

**4.1.6** To notify you about changes to our service as it is in our legitimate interests to do so; and

**4.1.7** To aggregate information about you, your spending and your use of our service with information about other users of our service in order to identify trends ("Aggregated Data"). We may pass Aggregated Data to third parties to give them a better understanding of our business and to bring you a better service. Aggregated Data will not contain information from which you may be personally identified.

**4.2.** We may pass your data to third party suppliers to assist in the provision of our services or for the maintenance, management and improvement of our internal systems, policies and procedures as it is in our legitimate interests to do so.

**4.3.** We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone provided that you have opted in to receive these communications.

**4.4.** If you are an existing customer, we will only contact you with information about goods and services similar to those which were the subject of a previous sale to you where we believe these will be of interest to you and where we have a legitimate interest in doing so.

**4.5.** If you are not a customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have given express consent to this.

**4.6.** If you do not want us to use your data in the manner set out in this clause 4 or to pass your details on to third parties for marketing purposes or if you would like us to make any amendments or rectifications to your data or would like us to delete your data from our system please email us at [enquiries@reeltechuk.com](mailto:enquiries@reeltechuk.com) to advise us.

**4.7.** We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

For the purposes of this Privacy Policy, our 'legitimate interests' include the proper administration, monitoring and improvement of our business and our site, the promotion of our business including direct marketing and the maintenance of the goodwill and reputation of REEL TECH UK Limited which includes the provision of excellent customer service and care.

## **5. DISCLOSURE OF YOUR INFORMATION**

**5.1.** We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

**5.2.** We may disclose your personal information to third parties in the following circumstances:

**5.2.1.** In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets as part of the sale or purchase process and to allow this transaction to proceed as it is in our legitimate interest to do so;

**5.2.2.** If REEL TECH UK Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets in accordance with our legitimate interests; and

**5.2.3.** 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 of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of REEL TECH UK Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction as it is in our legitimate interests to do so.

**5.3.** On occasion we may need to engage third party suppliers, web hosts and developers for the purpose of the maintenance, management and improvement of the services which we provide to you and to our other customers. 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.

## **6. YOUR RIGHTS**

**6.1.** You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can opt out of receiving such materials by checking certain boxes on the forms we use to collect your data (where applicable). You can also exercise the right at any time by contacting us at REEL TECH UK LIMITED of Unit 1 Mere Farm Business Complex, Hannington, Red House Lane, Northampton, NN6 9FP or by clicking the unsubscribe link on any marketing communication we send to you by email.

**6.2.** You can exercise the right to request any amendments or rectifications to your personal data by contacting us at the above address and can use this address to notify us if you would like us to delete or erase your data or, in certain circumstances, if you would like us to restrict the way in which we process your data. Please note that, in certain circumstances, we may not be able to delete or erase your personal data such as where this is still required for the purpose for which it was provided or where we have overriding legitimate interests in retaining your data.

**6.3** Where you have given us your consent to the specific processing of your personal data please note you have the right to withdraw that consent at any time. Should you wish to withdraw your consent please contact us at the address above.

**6.4** Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **7. ACCESS TO INFORMATION**

**7.1.** The Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Legislation by contacting us REEL TECH UK LIMITED of Unit 1 Mere Farm Business Complex, Hannington, Red House Lane, Northampton, NN6 9FP or by email at [enquiries@reeltechuk.com](mailto:enquiries@reeltechuk.com)

## **8. STORAGE OF YOUR DATA**

**8.1.** We shall store your data in accordance with our Data Retention Policy, a copy of which can be accessed by writing to us: REEL TECH UK LIMITED of Unit 1 Mere Farm Business Complex, Hannington, Red House Lane, Northampton, NN6 9FP

## **9. CHANGES TO OUR PRIVACY POLICY**

**9.1.** Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

## **10. CONTACT**

**10.1.** Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to REEL TECH UK LIMITED of Unit 1 Mere Farm Business Complex, Hannington, Red House Lane, Northampton, NN6 9FP

## **11. COMPLAINTS**

**11.1.** If you are unhappy with the way in which we have collected or processed your data or have any other complaint in relation to our handling of your data you can make a complaint to the Information Commissioner, further information can be found on the Information Commissioner's website at [www.ico.org.uk](http://www.ico.org.uk) or via their helpline on 0303 123 1113.

## **12. GOVERNING LAW**

**12.1.** This Policy and any dispute or claim arising out of it or in connection with it or its subject matter shall be governed by and construed in accordance with the laws of England and the parties irrevocably agree that the courts of England have exclusive jurisdiction to settle any dispute or claim arising out of or in connection with this policy or its subject matter.