

Website Privacy Statement

We are Swallowcourt Ltd and Keelex 176 Ltd (together “**the companies**”), companies incorporated in England and Wales. Our company numbers are 01748499 and 02839981 and our registered address is Peat House, Newham Road, TRURO, Cornwall, TR1 2DP.

We are committed to ensuring that your privacy is protected. We will continue to comply with the provisions of the Data Protection Act (“**DPA**”) until 25 May 2018, after which we will comply with the General Data Protection Regulation ((EU) 2016/679) (“**GDPR**”) unless and until the GDPR is no longer directly applicable in the UK, together with any national implementing laws, regulations and secondary legislation as amended or updated from time to time in the UK, and any successor legislation to the GDPR and the DPA (together “**Data Protection Legislation**”). We are the data controller of data you pass to us pursuant to this policy. Our Data Protection Officer can be contacted at DPO@swallowcourt.com.

This Privacy Policy sets out how we collect personal information from you and how the personal information you provide will be processed by us. By visiting the website at www.swallowcourt.com (the “**Website**”) you are accepting and consenting to the practices described in this Privacy Policy. If you do not consent, please do not submit any personal data to us.

What information do the companies hold and how will we use it?

Information you give the companies: You may give us information about you by completing enquiry forms on the website or by requesting via the website that we send you marketing information. The information you give us may include your name, email address, address/location and phone number. This does not include all personal data processed by the companies but only personal data it collects through its website.

We will retain this information while we are corresponding with you or providing services to you or to a Service User you represent. We will retain this information in accordance with our Data Security and Data Retention Policy and Procedure.

Information the companies collect about you: The companies may collect the following information from you when you visit the website:

- Technical information, including the 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; and
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the website (including date and time), products you viewed or searched for, page response times, website errors, length of visits to certain pages, page interaction information, methods used to browse away from the page and any phone number used to call our helpline

We retain this information in accordance with our Data Security and Data Retention Policy and Procedure.

Information we receive from other sources: This includes information we receive about you when you use other websites operated by us or other services we provide. This information may include your name, email

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address, postal address and phone number. We will retain this information in accordance with our Data Security and Data Retention Policy and Procedure.

Cookies

The Website uses cookies to distinguish you from other users of the website. For detailed information on the cookies we use and the purposes for which we use them, please see our cookie policy statement attached to this statement.

Use Made of the Information

The companies may use the information we receive and/or collect about you to:

- Fulfil our obligations under any contract we have entered into with you or with a Service User you represent, and to provide you or the relevant Service User with information or services you or the Service User has requested;
- Send you newsletters and marketing information if you have consented to us doing so;
- Notify you of products and services we feel may interest you, or permit third parties to do so if you have provided the appropriate consent; and
- Monitor website usage and provide statistics to third parties for the purposes of improving and developing the website and the services we provide via the website.

The companies process personal information for certain legitimate business purposes, which include some or all the following:

- Where the processing enables the companies to enhance, modify, personalise or otherwise improve the website, its services or communications;
- To identify and prevent fraud;
- To enhance the security of the companies network and information systems;
- To better understand how people interact with the companies websites;
- To administer the website and carry out data analysis, troubleshooting and testing; and
- To determine the effectiveness of promotional campaigns and advertising.

If we obtain consent from you to do so, we may provide your personal details to third parties so that they can contact you directly in respect of services in which you may be interested.

Where we are processing personal data we have obtained via the website on the basis of having obtained consent from you, you have the right to withdraw your consent to the processing of your personal data at any time. If you would like to withdraw your consent or prefer not to receive any of the above-mentioned information (or if you only want to receive certain information from us) please let us know by contacting us via the following webpage www.swallowcourt.com/contact-us/. Please bear in mind that if you object, this may affect our ability to carry out the tasks above for your benefit.

If you wish to have your information removed from our database or if you do not want us to contact you for marketing purposes, please let us know by contacting us via the following webpage www.swallowcourt.com/contact-us/ and we will take steps to ensure that this information is deleted as soon as reasonably practicable.

We will not share, sell or distribute any of the information you provide to us (other than as set out in this policy) without your prior consent, unless required to do so by law.

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Third Party Sites

Our website may contain links to third party websites, including websites via which you are able to purchase products and services. They are provided for your convenience only and we do not check, endorse, approve or agree with such third-party websites nor the products and/or services offered and sold on them. We have no responsibility for the content, product and/or services of the linked websites. Please ensure that you review all terms and conditions of website use and the Privacy Policy of any such third-party websites before use and before you submit any personal data to those websites.

How Safe is your Information?

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Protecting your security and privacy is important to us and we make every effort to secure your information and maintain your confidentiality in accordance with the terms of the Data Protection Legislation. The website is protected by various levels of security technology, which are designed to protect your information from any unauthorised or unlawful access, processing, accidental loss, destruction and damage.

We will do our best to protect your personal data but the transmission of information via the Internet is not completely secure. Any such transmission is therefore at your own risk.

Disclosure of your Information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006. We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you
- Third parties who may wish to contact you in respect of services or products they offer or sell which may be of interest to you, provided we receive your consent to such disclosure; and/or advertisers and advertising networks that require the data to select and serve relevant adverts to you and analytics and search engine providers that assist us in the improvement and optimisation of the website

Please note we may need to disclose your personal information where we:

- Sell any or all our business or assets or we buy another business or assets in which case we may disclose your personal data to the prospective buyer or seller
- Are under a legal duty to comply with any legal obligation or to enforce or apply our terms and conditions; or
- Need to disclose it to protect our rights, property or the safety of our customers or others, including the exchange of information with other companies, organisations and/or governmental bodies for the purposes of fraud protection and credit risk reduction

Your Rights in Respect of your Data

If any of the information you provide to us via the website changes, please let us know as soon as possible so that we can make the necessary changes to the information we hold for you on our database. If you wish to make any changes to your information, please contact us via the following webpage www.swallowcourt.com/contact-us/.

If you wish to access or rectify the information we hold about you, or request that such information be transmitted directly to another data controller, please contact us via the following webpage www.swallowcourt.com/contact-us/. We shall process your request to access your information within one month of receipt, or we'll let you know within that timeframe if we need more information from you. We will process your request free of charge.

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To request that your information is deleted or if you wish to restrict or object to the processing of your information, please contact us via the following webpage www.swallowcourt.com/contact-us/.

If you have any complaints about our use of your personal data, please contact us. You also have the right to complain to the relevant supervisory authority in your jurisdiction. In the UK, the supervisory authority is the Information Commissioner's Office. Contact details for the ICO can be found at <https://ico.org.uk/>.

If you have any further queries or comments on our Privacy Policy, please contact us via the following webpage www.swallowcourt.com/contact-us/ or you can contact us by emailing DPO@swallowcourt.com. We also welcome your views about our website and our Privacy Policy.

Cookies Policy Statement

COOKIES WEBSITE STATEMENT

Cookies are small text files which a website may put on your computer or mobile device when you first visit a Site or page. The cookie will help the website, or another website, to recognise your device the next time you visit. Web beacons or other similar files can also do the same thing. We use the term “cookies” in this policy to refer to all files that collect information in this way.

We use cookies to distinguish you from other users of the Application or the Site. This helps us to provide you with a good experience when you use the Application or browse the Sites and also allows us to improve the Service, the Application and the Site.