



## PELAtech Group – Group Privacy Policy

### 1. Introduction

This privacy policy (**Privacy Policy**) sets out the ways in which all members of **PELAtech Group Ltd** Company Number 08725402 (by which we mean PELA Systems Ltd - Company Number 08685676 and Datanetex Ltd - Company Number 06728085, both registered in the United Kingdom) may use your personal data.

In this Privacy Policy:

- **'we', 'us' or 'our'** means the PELAtech Group entity with which you are interacting as detailed above. For example, the PELAtech Group entity managing your account, or that you are purchasing goods or services from. We will make it clear to you which entity this is;
- **'the site'** means the PELAtech Group (including PELA Systems and Datanetex) website you are visiting or engaging with; and
- **'you' and 'your'** means you, the person engaging with us, purchasing goods or services or visiting our site.

By registering for an account, purchasing goods or services, subscribing to our services, visiting our site or otherwise interacting with us, we will process your personal data in accordance with this Privacy Policy.

### 2. How you can contact us:

**Address: FAO: The Data Protection Officer**

PELAtech Group  
The Portway Centre  
Spitfire Road  
Old Sarum  
Salisbury, Wiltshire  
SP4 6EB, United Kingdom.

**Email:** [privacy@pelatech.co.uk](mailto:privacy@pelatech.co.uk)

### 3. Information we may collect about you

- **Information you give us:**  
We collect any information you provide to us when you complete registration forms, or provide us with your details over the phone or by email, for example when you register an account with us, purchase goods or services from us or subscribe to our mailing list. This information might include your name, address, email address, phone number, bank information and other information relevant to a product or service.
- **Information we collect about you:**  
We will collect any information contained in any correspondence between you and us via contact forms on websites, and emails or telephone calls.
  - We may collect, for the purposes of any product registration, service or advice we provide, information about your location. For example, for certain services, we will be required to provide your name and address in order to deliver the service. This may include personal information, such as your name, address and postcode. In this situation, we will collect and store such data for the duration of the service being operational.
  - We collect information about you visiting our website and how you use it. This may include your IP address, geographical location, device information, browser type, referral source, length of visit, operating system, number of page views, which pages you viewed and similar information. This information may be collected by a third-party website analytics service provider on our behalf and/or may be collected using cookies. We also use cookies and pixels in our emails to track delivery and open rates, the results of which are stored against your email address and profile. For more information on cookies please refer to paragraph 6 below.

- **Information we receive from third parties:**

We may collect information about you from third parties that we work closely with for the purposes of delivering to you the services that you request from us. For example, we may engage third parties to assist us with our payment systems; these entities will collect information directly from you on our behalf. We may engage third parties to operate websites on our behalf; these entities will collect information directly from you about your visits to the website on our behalf.

- We may also receive information about you from third parties where you have consented to such third party sharing your information with us.

#### 4. How we use information about you

We may use your information for the following purposes, depending on the relationship we have with you. Prior to submitting your personal data to us, we will provide you more specific information where necessary about how we will use your data, and link you to this privacy policy.

We use personal data to:	The purpose of this is:	The applicable legal basis:
Provide you with information that you have requested from us, in relation to products, or services we provide (for example e-mail communication & related calls).	We will need to use your contact details to keep you updated about the products or services you have indicated you are interested in.	By specifically requesting information from us, you are consenting to us using your personal data for the purposes of communicating such information to you.
For general administration and the delivery of products or services, for example to contact you with information about a product or service.	We will need to use your details for planning and logistics, to invoice you, to provide you customer service in relation to the product or service, and general administration of your account, enquiry or service. Please note that we may also share your personal data with other entities in the PELAtch Group for this purpose.	Where you have requested information regarding a product or service, or we have delivered a product or service to you, we need to use your personal data in this way to perform our contractual obligations to you. Where you have requested information, but do not have a contract with us, it is our legitimate interest to use your personal data for general administration and logistics in relation to your enquiry.
To keep in contact with you about other similar products or services of ours that may be of interest to you, or for research purposes relating to a product or service.	To keep you up to date on similar products or services you have previously purchased from us in the past. To analyse the effectiveness of our products and offerings to you.	It is our legitimate interest to keep you up to date on similar products or services of ours you have utilised in the past. Where we rely on legitimate interests in this way, we will offer an opt out, and unsubscribe option on any marketing information we send you.
Pass on your contact details to our logistics partners to enhance your experience with a product or service you have signed up for or purchased.	We engage logistic partners in order to enhance your experience of our products and services, such as engaging carriers, service providers, consultants, manufacturers or distributors.	Where we <b>need</b> to share these details with such logistic partners in order to perform the contract we have with you, the legal basis would be the performance of a contract. In other circumstances, we have a legitimate interest to provide the details to our partners, because these services are required for a seamless experience, and it is in your interest to be provided with this information. If you prefer us not to share these details with our logistics partners, you can let us know during the contracting process.

To assess the activity of our services.	We assess how people use and purchase our products and services. We do this using any documentation, contract, invoice or communication we receive relating to the use of services. We use this information for analytics, and to improve and enhance our services.	It is our legitimate interest to monitor the location and engagement of our clients and users of services and products.
Transfer your contact details to a service provider, manufacturer, consultant or distributor.	The purposes for which your personal data will be communicated to enable the party to communicate with you directly regarding an outstanding matter or contract. For example: device warranty claim, which is handled by the manufacturer and they need to make initial contact with you.	When you purchase a product or service from us, you are consenting to your Personal Data being passed to the service provider, manufacturer, consultant or distributor, or any other third-party requiring your data in order to deliver any contracted element of our engagement. If you do not wish for your information to be passed on, please express this instruction at time of registering your account.
Analyse user traffic to measure use of our websites and improve their content.	We may use information such as your IP address for analytical purposes of our pages, this could also include improving the content of our websites and services.	We have identified web analytics as a legitimate interest of our business, and allow us to better meet your needs as a customer.
To comply with or abide by legal obligations or requirements.	We may need to use or process your personal data to comply with some legal requirements, an example being health and safety or use of a product/service.	Where we need to process your data for these reasons, the legal basis will be compliance with a legal obligation.

You can find out more information on the privacy **notice** provided at the time you submit your data to us or in your contract with us (if applicable).

## 5. Who we might share your data with

In certain circumstances we may share your personal information with:

- Other entities in the PELAtch Group. Where the relevant PELAtch Group entity is outside the EEA, we would only transfer data where an appropriate safeguard such as EU model clauses or Privacy Shield certification exists between the entities.
- Selected third parties that we work with, where necessary for the purposes of delivering to you services that you request from us. For example, when you register for a service we provide, we may need to share your information with third party sub-contractors, service providers or other PELAtch Group entities. Where we use such third parties, we enter contracts which ensure that the third party is obligated to provide at least the same level of data protection as the PELAtch Group entity entering into that contract, and we take reasonable, appropriate steps to ensure that the contractor effectively processes the personal data in a manner consistent with this Privacy Policy and our internal policies relating to the protection of Personal Data.
- Any other PELAtch Group entity or selected third party that you consent to our sharing your information with for marketing purposes (such consent will be sought prior to our sharing of this data).
- Any other third parties where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

## 6. Cookies

We use cookies to ensure that you get the most out of our site. Cookies are small text files which we store on the device you use to access the site. Cookies allow us to monitor your use of the software and simplify your use of the site. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie (which is not stored after you quit your browser) you would have to log on every time you access a new page.

If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>).

Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of our websites.

## 7. Third Party Content, Sites, and Contributions

Some of our websites may contain content and links to other websites or apps that are operated by third parties. We don't control these third-party websites or apps (including whether or not they store cookies) and this Privacy Policy does not apply to them. Please consult the terms and conditions and Privacy Policy of the relevant third-party website or app to find out how that site/app collects and uses your information and to establish whether and for what purpose they use cookies.

## 8. How we look after your data and how long we keep it for

We use a variety of technological and operational security measures to protect your information against any unauthorised access to, unlawful use of, and modification and destruction of any personal data we store.

We will retain your information for as long as is necessary to provide you with the services that you have requested from us, or for as long as the law otherwise permits. Where you have not purchased products or services, received consultation or registered an interest in a PELAtch Group company, or otherwise engaged with us in four years, we will delete your data, unless we have an obligation to retain it for longer (for example for taxation purposes).

Transmission of information over the Internet can be insecure, and although we employ measures to protect your information from unauthorised access we cannot always guarantee the security of information sent over the Internet.

## 9. Where we store your information

Where you are interacting with a PELAtch Group entity located inside the EU, our servers are situated inside the European Economic Area (EEA) and all of the information that we collect about you will be stored on these servers.

In certain circumstances your information may be processed outside of the EEA such as when another PELAtch Group entity assists us with the services you have requested from us, or we engage third parties based outside of the EEA. This could also be for example where you have signed up to exhibit, sponsor or attend an event outside the EEA. In such circumstances, we will take all steps necessary to ensure that any of your information is adequately protected and processed in accordance with this Privacy Policy, and where necessary, we put in place relevant safeguards to ensure the safe processing of your data.

## 10. Your rights in relation to your Personal Data

You have the right to:

- Request a copy of the personal data that we keep about you, by making a request in writing to the Data Protection Officer. Our Data Protection Officers details are provided on Page 1 of this policy. You can ask us to provide the data in a commonly used, machine readable format, and where we are able to; transmit this data to another organisation.
- Contact the Data Protection Officer if you are concerned that any of the information we hold on you is incorrect, to have that data corrected.
- Contact the Data Protection Officer to ask us to stop processing your data, or withdraw consent where we are relying on consent as the legal basis for any processing of your data.
- Contact the Data Protection Officer to request that we delete your personal data.
- To lodge a complaint with the data protection authorities if you believe we have not complied with any applicable data protection law. In the UK, the relevant authority is the Information Commissioners Office, you can find their details at [www.ico.org.uk](http://www.ico.org.uk).

## **11. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time. Updated privacy policies will be updated on the relevant PELAtch Group website, or provided to you at your request.

If you have any questions or concerns about the use of your Personal Information you believe has not been covered by this document, please contact the PELAtch Group entity you are engaging with before submitting any other correspondence, account application or order.