

Attwood Product Development - Privacy Policy Notice - Issue A

The policy: This privacy policy notice is for websites under the direct and exclusive control of Attwood Product Development Limited and governs the privacy of those who use them. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using our websites and using our services, including your rights under current laws and regulations. By continuing to use our websites and services, you agree to the policies detailed in this document.

Policy key definitions:

- "I", "our", "us", or "we" refer to the following businesses and trading names Attwood Product Development.
- "you", "the user" refer to the person(s) using this website.
- GDPR means UK General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

Processing of personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

We are registered with the ICO under the Data Protection Register; our registration number is C1793316. Further details can be found at ico.gov.uk.

Lawful basis: *Consent and Legitimate Interests*. The reason we use this basis is to provide or improve our services and to maintain the integrity of our systems and processes.

Data retention period: We will continue to process your information on this basis until you withdraw consent, or it is determined that your consent no longer exists.

Sharing your information: We do not share your personal information with third parties unless legally compelled by a UK court of law to do so.

Lawful basis: *Contract, Vital Interests and Public Task*. The reason we use this basis is to provide or improve our services and to maintain the integrity of our systems and processes as part of a written or implied commercial contract.

Data retention period: We will continue to process your information on this basis until you withdraw consent or we determine your consent no longer exists.

Sharing your information: We will share your personal information with third parties only where we are contractually obliged to do so.

Lawful basis: *Scientific and historical Research and Statistical Surveys*. The reason we use this basis is to provide or improve our services and processes. Additionally, we may use anonymised and or aggregated data in published reports.

Data retention period: We will continue to process your information on this basis until you withdraw consent or we determine your consent no longer exists.

Sharing your information: We will share your personal information with third parties only where we are contractually obliged to do so.

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Lawful basis: *Legal Obligation and Criminal Offence Data*. The reason we use these basis is to comply with the UK laws relevant to the continuity of business interests.

Data retention period: We shall continue to process your information until the consent between us ends or it is determined your consent no longer exists.

Sharing your information: We do not share your personal information with third parties unless legally compelled by a UK court of law to do so

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

Your individual rights

Under the GDPR you have a right to be informed;

- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making.

You also have the right to complain to the ICO icoc.co.uk if you feel there is a problem with the way we are handling your data. We handle subject access requests in accordance with the GDPR.

Internet cookies and IDs

We use cookies and IDs on our website(s) to provide you with a better user experience. We do this by placing a small file on your device / computer to track how you use the website, to record or log whether you have seen particular information, to keep you logged into the website where applicable, to display relevant adverts or content. Some cookies are required to enjoy and use the full functionality of this website. Some elements of this website may use user IDs to allow the correct functionality of the website.

Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

The platform Cookies we use are for example; Facebook, Twitter(X), LinkedIn, TikTok, Google, Instagram, YouTube, Mailchimp, Brevo and Hot Jar. From time to time, we alter the platforms we use. For the latest list, contact us directly.

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

Transparent Privacy Explanations

We have provided further explanations about user privacy and the way we use this website to be transparent and honest about our use of data.

Email marketing messages & subscription

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS (Email Marketing Service) provider. An EMS is a third-party service provider which allows us to send emails for marketing or to inform you about a purchase.

Email messages that we send may contain tracked clickable links or similar server technologies in order to identify subscriber activity within email messages. Where used, such messages may record a range of data such as; times, dates, IP addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations, will show the activity of each subscriber.

Any email messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any email message for instructions on how to unsubscribe and manage your preferences.