

Please read this privacy notice ("Privacy Notice") carefully as it describes our collection, use, disclosure, retention and protection of your personal information. This Privacy Notice applies to any website, application or service which references this Privacy Notice. Where you provide us with your personal information in any of the ways described in section 2 below, you agree that we may collect, store and use it: (a) in order to perform our contractual obligations to you; (b) based on our legitimate interests for processing (i.e. for internal administrative purposes, data analytics and benchmarking (see section 3 below for more information), direct marketing, maintaining automated back-up systems or for the detection or prevention of crime); or (c) based on your consent, which you may withdraw at any time, as described in this Privacy Notice.

## 1. Who we are

This Privacy Notice applies to all products, and services offered by Thermabead Ltd (a company incorporated in England with company registration number 8072262 and whose registered office address is Units 1 & 2, Shipston Close, Worcester, WR4 9XN, and its affiliates, but excludes any products applications or services that have separate privacy notices which do not incorporate this Privacy Notice.

## 2. How we collect information

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide to us when you:

- ❑ register to use our websites or services; this may include your name (including business name), address, email address and telephone number. We may also ask you to provide additional information about your business and your preferences;
- ❑ place an order using our websites, applications or services; this may include your name (including business name), address, contact (including telephone number and email address) and payment details;
- ❑ complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, enter any competitions or prize draws, download information such as white papers or other publications or participate in any other interactive areas that appear on our website or within our application or service;
- ❑ interact with us using social media;
- ❑ provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details; and
- ❑ contact us offline, for example by telephone, fax, SMS, email or post.

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers or public sources (e.g. for customer due diligence purposes), but in each case as permitted by applicable laws.

### Providing us with information about others

If you provide us with personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. In so far as required by applicable data protection laws, you must ensure that you have provided the required notices and have obtained the individual's explicit consent to provide us with the information and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our Privacy Notice.

## 3. How we use your information

To the extent permissible under applicable law, we use your information to:

- ❑ provide any information and services that you have requested or any applications or services that you have ordered;
- ❑ compare information for accuracy and to verify it with third parties;
- ❑ provide, maintain, protect and improve any applications, products, services and information that you have requested from us;

- ❑ manage and administer your use of applications, products and services you have asked us to provide;
- ❑ manage our relationship with you (for example, customer services and support activities);
- ❑ monitor, measure, improve and protect our content, website, applications and services and provide an enhanced, personal, user experience for you;
- ❑ undertake internal testing of our website, applications, systems and services to test and improve their security, provision and performance, in which case, we would pseudonymise any information used for such purposes, and ensure it is only displayed at aggregated levels which will not be linked back to you or any living individual;
- ❑ provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- ❑ detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);
- ❑ contact you to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products and services);
- ❑ to monitor, carry out statistical analysis and benchmarking, provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual;
- ❑ deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of our applications and services;
- ❑ deliver joint content and services with third parties with whom you have a separate relationship (for example, social media providers); and
- ❑ provide you with location-based services (for example, advertising and other personalised content), where we collect geo-location data.

To the extent permitted by applicable law, we retain information about you after the closure of your Thermabead account, if your application for a Thermabead account is declined or if you decide not to proceed. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Our website, applications (including mobile applications) and services may contain technology that enables us to:

- ❑ check specific information from your device or systems directly relevant to your use of the websites, applications or services against our records to make sure the websites, applications or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
- ❑ obtain information relating to any technical errors or other issues with our website, applications and services; collect information about how you and users use the functions of the features of our website, applications and services; and
- ❑ gather statistical information about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services (where applicable).

In addition to the purposes described in this section 3, we may also use information we gather to deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful, based on your use of the website, applications or services or any other information we have about you (depending on the websites, applications or services, you may be able to configure these features to suit your preferences).

We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about our website, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

#### Data analytics and benchmarking

We may use information generated and stored during your use of our services for our legitimate business interests to enable us to give you the best service and/or solutions and the best experience. These purposes include to:

- ❑ deliver advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of services;
- ❑ carry out research and development to improve our services, products and applications;
- ❑ develop and provide new and existing functionality and services (including statistical analysis, benchmarking and forecasting services); and
- ❑ provide you with location-based services (for example location relevant content) where we collect geo-location data to provide a relevant experience.

Whenever we use your information for our legitimate interests, we will ensure that your information is processed on a pseudonymised

basis and displayed at aggregated levels, which will not be linked back to you or to any living individual.

You have the right to object to processing based on our legitimate interests, and if you wish to do so, please contact us at [human.resources@thermabead.co.uk](mailto:human.resources@thermabead.co.uk) to discuss this further. If you object, this may affect our ability to provide certain services and/or solutions for your benefit.

#### 4. Sharing your information

We may share your information with:

- ❑ our service providers and agents (including sub-contractors) or third parties so that they may help us to provide you with the applications, products, services and information you have requested.
- ❑ third parties for marketing purposes (e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities. For example, financial services organisations (such as banks, insurers, finance providers), payment solutions providers, software and services providers that provide business solutions);
- ❑ credit reference and fraud prevention agencies;
- ❑ regulators to meet Thermabead Ltd legal and regulatory obligations;
- ❑ law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
- ❑ any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example, in response to a court order);
- ❑ any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- ❑ our own professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- ❑ another organisation if we sell or buy (or negotiate to sell or buy) any business or assets;
- ❑ another organisation to whom we may transfer our agreement with you; and
- ❑ Government departments where reporting is mandatory under applicable law.

We may share non-personally identifiable information about the use of our website, applications, products or services publicly or with third parties, but this will not include information that can be used to identify you.

#### Your information and your rights

If you are based within the EEA or within another jurisdiction having similar data protection laws, in certain circumstances you have the following rights:

- ❑ the right to be told how we use your information and obtain access to your information;
- ❑ the right to have your information rectified or erased or place restrictions on processing your information;
- ❑ the right to object to the processing of your information e.g. for direct marketing purposes or where the processing is based on our legitimate interests;
- ❑ the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”);
- ❑ where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions;
- ❑ the right to object to any decisions based on the automated processing of your personal data, including profiling; and
- ❑ the right to lodge a complaint with the supervisory authority responsible for data protection matters (e.g. in the UK, the Information Commissioner’s Office).

If you request a copy of your information you may be required to pay a statutory fee.

If we hold any information about you which is incorrect or if there are any changes to your details, please let us know by so that we can keep our records accurate and up to date.

If you withdraw your consent to the use of your personal information for purposes set out in our Privacy Notice, we may not be able to provide you with access to all or parts of our website, applications, and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes, or as otherwise permitted by applicable laws and regulations. Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

## 5. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. However, we will not reduce your rights under this Privacy Notice. We will always update this Privacy Notice on our website, so please try to read it when you visit the website (the 'last updated' reference tells you when we last updated this Privacy Notice).

## 6. Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. We will do our best to protect your personal information but we cannot guarantee the security of your information which is transmitted to our website, applications or services or to other website, applications and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe – we will not share this password with anyone.

If you believe your account has been compromised, please contact us at [human.resources@thermabead.co.uk](mailto:human.resources@thermabead.co.uk)

## 7. Transfers outside of the European Economic Area

Personal information in the European Union is protected by data protection laws but other countries do not necessarily protect your personal information in the same way.

## 8. Other sites and social media

If you follow a link from our website, application or service to another site or service, this Privacy Notice will no longer apply. We are not responsible for the information handling practices of third-party sites or services and we encourage you to read the privacy notices appearing on those sites or services.