

## Privacy Policy

Please read this document carefully before using [auto2xtech.com](https://auto2xtech.com) or ordering any product from Auto2x.

This privacy notice provides you with details of how we collect and process your personal data through your use of our site [auto2xtech.com](https://auto2xtech.com). By providing us with your data, you warrant to us that you are over 13 years of age. Auto2x is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). Please note this Privacy Policy only applies to the use of Information collected via our website [auto2xtech.com](https://auto2xtech.com) which is hosted, maintained and managed on behalf of Auto2x by 3<sup>rd</sup> parties.

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### Our fundamental principle

We do not collect any Sensitive Data about you, i.e. about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offenses.

### Gathering of personal data

Personal data means any information capable of identifying an individual. It does not include anonymized data. We may process the following categories of personal data about you:

#### 1. Communication Data

This includes any communication that you send to us whether that be through the contact form on our websites, through email, text, social media messaging or any other communication that you send us.

- We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims.
- Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

#### 2. Customer Data

This includes data relating to any purchases of products and/or services such as your name, title, job title, company name, billing address, delivery address, postcode, email address, phone number, contact details, purchase details and your payment card details.

- We process this data to supply the products and/or services you have purchased and to keep records of such transactions.
- Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

### 3. Website visitors and other user data

This includes data about how you use our websites and any online services together with any data that you post for publication on our websites or through other online services.

- We process this data to operate our websites and ensure relevant content is provided to you, to ensure the security of our websites, to maintain back-ups of our websites and/or databases and to enable publication and administration of our websites, other online services, and business.
- Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our websites and our business.

### 4. Technical Data

This includes data about your use of our websites and online services such as your IP address, your login data, details about your browser, length of visit to pages on our websites, page views and navigation paths, details about the number of times you use our websites, time zone settings and other relevant analytical data and technology on the devices you use to access our websites. The source of this data is from analytics tracking systems.

- We process this data to analyse your use of our websites and other online services, to administer and protect our business and websites, to deliver relevant content and promotions to you and to understand the effectiveness of our marketing.
- Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our websites and our business and to grow our business and to decide our marketing strategy.

### 5. Marketing Data

This includes data about your preferences in receiving marketing communications from us. We process this data to enable you to partake in our promotions such as competitions, prize draws and free giveaways, to deliver relevant website content and communications to you and measure or understand the effectiveness of this advertising.

- Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

We may use **Customer Data**, **User Data**, **Technical Data** and **Marketing Data** to deliver relevant website content and advertisements to you (including LinkedIn adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you.

- Our lawful ground for this processing is legitimate interests which are to grow our business. We may also use such data to send other relevant marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

## 6. Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offenses.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. We may process your personal data without your knowledge or consent where this is required or permitted by law. We do not carry out automated decision making or any type of automated profiling.

## 7. How we collect your personal data

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site, by sending us emails, applying for vacancies, or by providing us with your business card/details at meetings, events or similar). We may automatically collect certain data from you as you use our websites by using cookies and similar technologies. Please see our [Cookie Policy](#) for more details about this.

We may receive data from third parties outside the EU such as analytics and search information providers like Google, social networks such as LinkedIn, and providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## Cookie Policy

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of these websites may become inaccessible or not function properly. For more information about the cookies we use, please see below our [Cookie Policy](#).

### 1. What's a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyze traffic and for advertising and marketing purposes. Cookies are used by nearly all websites and do not harm your system.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

### 2. How do we use cookies?

## Auto2x Privacy Policy

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website as well as products and/or services in response to what you might need or want.

### Cookies are either:

- **Session cookies:** these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any personal data from your computer; or
- **Persistent cookies:** a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics.

### Cookies can also be categorized as follows:

1. **Strictly necessary cookies:** These cookies are essential to enable you to use the website effectively, such as when buying a product and/or service, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
2. **Performance cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
3. **Functionality cookies:** These cookies allow our website to remember choices you make and provide enhanced features. E.g., we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymized.

Please note that third parties who advertise on our website (including, for example, trade show organizers, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

## Marketing communication

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if:

- (i) you made a purchase or asked for information from us about our goods or services or
- (ii) you agreed to receive marketing communications and, in each case, you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any 3<sup>rd</sup> party for their own marketing purposes we will get your express consent.

You can ask us or 3<sup>rd</sup> parties to stop sending you marketing messages at any time by logging into the websites and checking or unchecking the relevant boxes to adjust your marketing preferences by following the opt-out links / marketing message sent to you or by emailing us at [info@auto2xtech.com](mailto:info@auto2xtech.com) at any time.

If you opt out of receiving marketing communications this does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

## Links to 3<sup>rd</sup> parties

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy notice of every website you visit.

## Disclosures of your personal data

We may have to share your personal data with the parties set out below:

- Other companies in our group who provide services to us. Intercompany agreements are in place with our non-EEA (European Economic Area) sites demonstrating commitment to the GDPR principles and practices. We employ shared IT solutions and policies which ensure data privacy, protection and security across all areas of the business.
- Service providers who provide IT, HR, Finance, Marketing and system administration services.
- Professional advisers including lawyers, bankers, auditors, and insurers.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## International data transfers

We share your personal data within our group of companies which involves transferring your data outside the European Economic Area (**EEA**). Countries outside of the European Economic Area do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

### Data protection

#### 1. Data security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorization. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

#### 2. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, incl. for the purposes of satisfying any legal, accounting, or reporting requirements. When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, the potential risk of harm from unauthorized use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements. For tax purposes, the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances, we may anonymize your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### Your legal rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent. See more about these rights [here](#).

If you wish to exercise any of the rights set out above, please email us at [info@auto2xtech.com](mailto:info@auto2xtech.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office ([ICO](#)), the UK supervisory authority for data protection issues. We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

If you have any questions about this privacy notice, please contact: [info@auto2xtech.com](mailto:info@auto2xtech.com).