

Privacy Notice

Introduction

ACI Group Ltd takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact: datacontroller@acigroup.biz. If you have entered into a contract with any of our divisions, the controller of your data will be ACI Group Ltd.

Our personal data handling policy and procedures have been developed in line with the requirements of the General Data Protection Regulation and applicable national law.

1. What personal data do we collect?

We collect and process personal data about you when you interact with us and our products, when you purchase from us or supply us with goods and services. The personal data we process includes:

- name;
- home or work address, email address and/or phone number;
- job title;
- payment and delivery details, including billing and delivery addresses;
- personal data related to the browser or device you use to access our website;
- internet browser and operating system;
- any other personal data you provide.

2. How do we use this personal data and what is the legal basis for this use?

We process the personal data listed in paragraph 1. above for the following purposes:

- to establish and fulfill a contract with you, for example, if you make a purchase from us or enter into an agreement to provide us with goods or services. This may include verifying your identity, communicating with you, providing customer services and arranging the delivery or other provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it;
- to comply with applicable law and regulation;
- in accordance with our legitimate interests in protecting ACI Group Ltd's legitimate business interests, and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- with your express consent to respond to any comments or complaints we may receive from you, or to investigate any complaints received from you or from others, about our website or our products or services;

- we may use information you provide to personalise (i) our communications to you; (ii) our website; and (iii) products or services for you, in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;
- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- we may use your information to invite you to take part in market research or surveys.

We may also send you direct marketing in relation to our products and services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. We will not send you direct marketing of third party products unless we represent such third parties. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

3. *With whom and where will we share your personal data?*

We may also share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial and advisors;
- marketing and communications agencies where they have agreed to process your personal data in line with this Privacy Notice;
- market research companies;
- our suppliers, business partners and sub-contractors; and/or
- search engine and web analytics.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of ACI Group Ltd for the purposes above.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

4. *How long will you keep my personal data?*

We will not keep your personal data for any purpose longer than necessary to fulfill the original or a compatible purpose. In some instances, we are required to retain certain information by law and for as long as reasonably necessary to meet regulatory or accreditation requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions. Where this is the case, your personal data will only be processed for the relevant legitimate purpose and not used for marketing.

We will keep your personal data for the length of any contractual relationship you have with us and after that for a period of up to 6 years.

Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your personal data for this purpose (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 2 years from when you last interacted with us or our content.

In the case of any contact you may have with our customer services team, we will retain your details for as long as is necessary to resolve your query and for two weeks after the query is closed.

We may retain your personal data for a time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. After it is no longer necessary for us to retain your personal data, we dispose of it securely.

5. *Where is my data stored?*

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards will be in place. Further information may be obtained from our Privacy Team.

6. *What are my rights in relation to my personal data?*

You have the right to ask us not to process your personal data for marketing purposes. If you are a private individual you can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.



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7. Where can I find more information about ACI Group Ltd's handling of my data?

Should you have any queries regarding this Privacy Notice, about ACI's processing of your personal data or wish to exercise your rights you can contact our Data Controller by using this email address: datacontroller@acigroup.biz. If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>

