



Privacy Policy

This policy contains a description of what is considered personal data, what types of personal data we collect, for what purposes that data is collected, how it is processed and what rights you have in this regard. At all times, we endeavour to handle personal data with respect, confidentially and sensitively.

PERSONAL DATA PROCESSING

1. What is personal data

Personal data refers to any information relating to an identified or identifiable natural person who can be directly or indirectly identified in particular by reference to an identifier, such as for instance your contact information and information contained within a registration form.

2. General principles for personal data processing by Actif-i-ti

When gathering and/or processing personal data we adhere to the following principles:

- a. We will only collect personal data for specified, explicit and legitimate purposes;
- b. Will not collect any personal data beyond what is considered reasonably necessary to accomplish those purposes;
- c. We will not use personal data for purposes other than that for which the data was collected, except as stated herein, or with prior consent;
- d. We will not transfer personal data to unauthorised third parties, except as stated herein, or with prior consent. An example of where we would ask for such consent would be to enable us to pass information that may include personal data to an organisation providing support not covered under your agreements with us, such as, but not exclusively medical professionals in cases of medical need beyond first aid
- e. We will do our best to ensure that information is up to date by encouraging you to verify your personal data periodically;
- f. We will maintain appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access and against all other unlawful forms of processing; and
- g. Except when stated herein, we will not store personal data longer than is necessary to accomplish the purpose for which the data were collected or for which they are further processed, or as is required by applicable law.

3. Personal data we collect and process

When you engage with Actif-i-ti via any method we may collect and process your personal data. The personal data that we collect and process can be categorised as follows:

- a. Your personal details, such as your name, e-mail address, physical address (if provided), phone number(s) (if provided), IP address(s), in some cases geo-location and language(s).
- b. Your purchase information, such as:
 - i. your personal details as specified above, company name (if applicable and provided), your delivery information, such as delivery address and other such additional contact details;



- ii. your order information, such as product name, quantity, quantity, date of purchase and manufacturer/supplier information;
 - iii. your payment information, such as credit card, bank details for Direct Debit payments or similar payment information and referral source (if applicable).
- c. Information provided when completing surveys, questionnaires and feedback forms, such as your personal details as specified above, product information and your feedback on your use of your product(s) and/or service and evaluation of the same.
 - d. Your behaviour information collected via use of cookies and similar technologies like pixels, tags and other identifiers in order to remember your preferences, to understand how our websites and app(s) are used and to customise our marketing offerings. Please see our cookie policy for more detailed information.

4. How we use personal data

We only collect and process personal data if one or more of the reasons outlined below applies:

- a. We provide you with customised or semi-customised information relating to news, events, competitions and/or similar marketing content related to Actif-i-ti, its products and products sold in collaboration with third parties. Our processing in this regard will be based on your consent thereto.
- b. We handle your purchase orders, complete purchase transactions, ensure delivery of purchased product(s)/service(s), handle possible returns. Our processing is necessary for the performance of a contract, to which you are a party.
- c. We provide you with authorised and agreed services or consultancy proactively or reactively whether related to a contract/agreement you hold for our services or do not.
- d. We provide you with other forms of customer service, handle your requests or complaints and provide you with product/service. Our processing is necessary for the performance of a contract, to which you are a party.
- e. We ensure better customer experience by providing you with personal benefits, such as discounts or customised offers based on previous purchases and possible onward referrals. Our processing in this regard will be based on your consent thereto.
- f. We may collect your feedback regarding your use of products and services by inviting you to complete surveys, questionnaires or feedback forms. Our processing in this regard will be based on your consent thereto.

Accordingly, some of your personal data is collected and processed in order for us to fulfil our contractual obligations to you, for instance, when you purchase our products/services, contact us with enquires and/or feedback or otherwise engage with us. Should you choose not to provide us with the requested and necessary personal data in this regard, we might not be able to fully satisfy your request.

5. Where we store and process your personal data

As a general principle, your personal data is stored and processed within the European Economic Area (EEA).

6. Our disclosure of your personal data to third parties



As a general principle, we collect and process data in order to facilitate or improve Actif-i-ti products, services, support or offers.

We do not sell your personal data or share the said data with third parties, except to the extent stated in this Privacy Policy.

We may disclose your personal data to third parties to the extent required by law, court order or a decision rendered by a competent public authority and for the purpose of law enforcement. In addition, we may share your personal data with the following third parties:

- a. Our distribution partners and vendors in order to deliver products and services to you, to ensure a consistent level of service across our products and services, to enhance our products, services and your customer experience.
- b. Third party vendors carrying out services on our behalf, including billing, sales, marketing, technical support, advertising, analytics, research, customer service, product service support, shipping and purchase order fulfilment, data storage, validation, security, fraud prevention, payment processing, and legal services. Such third-party vendors have access to perform these services but are prohibited from using your personal data for other purposes.
- c. Third parties in order to establish, exercise or defend legal rights of Actif-i-ti.
- d. Third parties in the event of any merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Actif-i-ti assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).
- e. Other third parties subject to your consent.

Where we disclose your personal data to a third party, we take all reasonable steps to ensure that those third parties are bound by confidentiality and privacy obligations with respect to the protection of your personal data. The disclosure is conducted in compliance with legal requirements which may include entering into data processing agreements with the relevant third parties, to ensure that personal data is only processed in accordance with our instructions, applicable law and regulations and for the purpose specified by us and to ensure adequate security measures.

7. Retention of your personal data

We keep your information for no longer than necessary for the purposes for which it is collected. The length of time for which we retain information depends on the purposes for which we collected and use it.

8. Cookies

Actif-i-ti collects information during your visit to our websites by utilisation of cookie technology.

A cookie is a piece of programming information contained in a very small text file that is placed in your Internet browser or elsewhere on your hard drive. You can control acceptance of cookies by modifying your Internet browser preferences. You have the ability to accept all cookies, to be notified when a cookie is set or to reject all cookies. Please note that, if you choose to block all cookies (including essential cookies) you may not be able to access all or part of our site and may be unable to use those services or engage in activities that require the placement of cookies.



Actif-i-ti uses cookies to distinguish you from other users of our website and to help us compile aggregate statistics about usage of our websites.

For more detailed information about cookies, you may wish to visit www.allaboutcookies.org.

9. Responsible for processing

Actif-i-ti, 4 Heol Gwyddalis, Dihewyd, Lampeter, Ceredigion, SA48 7PN is the data controller and is responsible for the processing of your personal data.

YOUR RIGHTS

10. Access to your personal data and data portability You have right to access and receive the personal data concerning you, which you have provided to Actif-i-ti, in a structured, commonly used and machine-readable format and have the right to transmit this data to any third party, you should choose. Your personal data processed by Actif-i-ti can be accessed by contacting us by telephone, e-mail or traditional post.

11. Updating and/or deleting your personal data

We encourage you to update your personal data provided to Actif-i-ti any time there are changes to your personal data. This can be done by contacting our office.

In order to ensure that your personal data processed by us is up-to-date we request you to check and, if relevant, update your personal data at least once a year. Your personal data can be deleted from Actif-i-ti servers unless entitled or obliged by applicable law and regulations to keep and process such information regardless withdrawal of your consent. Following deletion your personal data will be deleted from servers of Actif-i-ti without undue delay.

You may also contact Actif-i-ti to review, update or delete personal data stored about you. Please note that prior to accessing and making changes to your account, we will need to verify your identity fully.

12. Right to withdraw your consent

Some of Actif-i-ti's processing activities may be based on your consent. In such case, you will have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of processing conducted prior to the withdrawal. If you withdraw your consent, Actif-i-ti will cease to process your personal data, unless and to the extent the continued processing or storage is permitted or required according to other applicable laws and regulations.

Please note that as a consequence of your withdrawal of your consent, Actif-i-ti may not be able to meet your requests or provide you with our services.



13. Right to restriction of processing and right to object

You have the right to restriction of processing of your personal data, if the personal data is incorrect, if the processing is unlawful, but you oppose erasure of your personal data, if Actif-i-ti no longer requires your personal data for the purposes of processing, but storing such data is requested by you for the establishment, exercise or defence of legal claims, or if you have objected to processing and verification, whether Actif-i-ti continues to have legitimate interest(s) in the given personal data is pending.

At any-time you have the right to object to processing of your personal data collected and processed for purposes of the legitimate interests pursued by Actif-i-ti.

Furthermore, you have the right to object to processing of your personal data for direct marketing purposes. You can do so by unsubscribing from our marketing information or by contacting us.

14. Right to complain

If you want to complain about a privacy breach, please contact Actif-i-ti by sending your complaint to Actif-i-ti, 4 Heol Gwyddalis, Dihewyd, Lampeter, Ceredigion, SA48 7PN 9BY or by sending an e-mail to lleucu@actif-i-ti.cymru.

We will acknowledge receipt of your complaint within seven (7) business days. We will do our best to resolve it as quickly as possible and within one (1) month from the date of complaint. In cases where a response would require a longer term than one (1) month, we will let you know and inform you of the relevant reason(s).

If you are not satisfied with outcome of your complaint or with handling of your complaint at Actif-i-ti, you may refer your complaint to Information Commissioners Office (ICO) <https://ico.org.uk/global/contact-us/>

MISCELLANEOUS

15. Third-party websites, plug-ins and services

Websites, apps and products supplied and/or maintained by Actif-i-ti may contain links to third party websites, plug-ins, for instance social media login plug-in or services. If you choose to use 3rd party websites, plug-ins or services, you may disclose your information to those third-parties. Actif-i-ti is not responsible for the content or practices of those websites, plug-ins or services.

The collection, use, and disclosure of your personal data will be subject to the privacy policies of these third parties which we strongly recommend you to read.

16. Data security



Actif-i-ti is committed to protecting the security of your personal data. We utilise several organisational, technical, and administrative measures to protect your personal data under our control, such as control of access, transmission, input and availability and the separation of data.

All external transmissions of personal data facilitated by Actif-i-ti are protected by encryption.

All data storage and processing at computer facilities utilised by Actif-i-ti are subject to written contracts. If you have reason to believe that your interaction with Actif-i-ti is no longer secure please notify us of the problem immediately by contacting us.

17. Changes to our Privacy Policy

Actif-i-ti may modify or update this Privacy Policy when necessary to reflect changes in our products and services, changes in applicable legislation, regulations or practice and to address customer feedback. Accordingly, please review it periodically.

18. Contact details

If you have questions about this Privacy Policy or Actif-i-ti's processing of your personal data, please contact us at:

Actif-i-ti,
4 Heol Gwyddalis,
Dihewyd,
Lampeter,
Ceredigion,
SA48 7PN

or by sending an e-mail to our central email address:

lleucu@actif-i-ti.cymru