

PRIVACY POLICY

ICS Electronics Ltd are committed to protecting and respecting your privacy in a transparent manner. This policy, together with our terms and conditions, [http://www.icselectronics.co.uk/sites/default/files/user_uploads/files/ics_tandcs.pdf] sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.icselectronics.co.uk or by requesting a quotation from our company, you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation (the **Act**), the data controller is ICS Electronics Ltd of Unit V, Rudford Industrial Estate, Ford, West Sussex, BN18 0BF.

LAWFUL BASIS OF PROCESSING

Under the GDPR, the lawful basis of processing defines the purpose for which we are holding and using your data. ICS Electronics Ltd have established that in the majority of cases we use the contract lawful basis to process your data. Under this lawful basis, we will hold and use your data (contact information) in order to negotiate and complete a contract, and will ensure that we do not hold your data for longer than necessary and only retain your data for compliance with any applicable laws after the contract is complete.

If we intend to use your data for any marketing during or after the contract, this would fall under the consent lawful basis and we will ensure that you have given us consent before using your data in this way. We will also give you an option to opt out of any marketing activity via email or post.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- ***Information you give us***

You may give us information about you by filling in forms on our site [www.icselectronics.co.uk] or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, request licences, contact us, request upgrades and app activation codes; search for products or access support information such as the NAVTEX Station Database and when you report a problem with our site. The information you give us may include your name, address, e-mail address, credit card or bank details and phone number.

- ***Information we collect about you***

With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our company telephone number.
- ***Information we receive from other sources***
We work closely with third parties (including, for example, delivery services, business partners, sub-contractors in technical, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

HOW WE USE YOUR INFORMATION

We use information held about you in the following ways:

- ***Information you give to us***
We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - to provide you with information about goods or services we feel may interest you (including new product launches). If you are an existing customer, we will only contact you by electronic means (e-mail) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you.
 - to notify you about changes to our service;
 - to notify you of any changes to bank details or updates to price lists
 - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- ***Information we collect about you***
We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our website to ensure that content is presented in the most effective manner for you and for your computer;

- to allow you to participate in interactive features of our service, when you choose to do so;
 - as part of our efforts to keep our site safe and secure;
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- ***Information we receive from other sources.***
We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We will never share your data unless it is beneficial to you. We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with [them or] you.
- Analytics, hosting services and search engine providers that assist us in the improvement and optimisation of our website.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- Legal advisors and third parties who may assist us with legal claims or in the meeting of standards.
- Accounting and financial services to ensure that we are in full compliance with relevant regulations.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If ICS Electronics Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use [http://www.icselectronics.co.uk/sites/default/files/user_uploads/files/ics_tandcs.pdf] and other agreements; or to protect the rights, property, or safety of ICS Electronics Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

COOKIES

Our website uses cookies to help identify your computer so we can tailor your user experience. This helps us to provide you with the best experience possible when you browse our website and allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Website Privacy policy [<http://www.icselectronics.co.uk/website-privacy-policy>].

WHERE WE STORE YOUR PERSONAL DATA

At ICS Electronics Ltd, we take every action we can to ensure that your data is as secure and protected as possible. All information you provide to us is encrypted and stored on our secure servers. We consider cyber security a top priority and ensure that all anti-virus software, firewalls and operation systems are up to date. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We keep up to date with the latest cyber security and have high security passwords to access all computers.

Any financial information that we acquire from yourself or your company, such as credit card details, are shredded as soon as payment has been taken for your goods or services. We do not keep or store any personal financial information. Payments that are made through Paypal are protected to the highest of standards and details of their privacy policy can be found on their website – a small sample of this can be seen below:

“PayPal is committed to handling your customer information with high standards of information security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfil their job responsibilities.”

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing at any time by contacting us at Unit V, Rudford Industrial Estate, Ford, Arundel, BN18 0BF or at sales@icselectronics.co.uk.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these

websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. We will provide a copy of the information within one month of request. We may charge a reasonable administration fee when a request is noticeably unfounded or excessive or to comply with requests for further copies of the same information.

Under the contract lawful basis, you, as the data subject, have the right to object us processing your data for particular purposes. Regarding your right to the erasure of data, we will comply as far as we can in accordance to your rights unless we have a legitimate reason to process the data, or if we are doing so to establish, exercise or define a legal claim.

We ensure to keep all data relevant and up to date; if you notice that your data is incorrect, then you have a right to rectify inaccurate data. Please notify us of any changes that should be made to data that we hold about you.

CHANGES TO OUR PRIVACY POLICY

We, as a company, are dedicated to ensuring that our privacy policy and all other policies in respect of the GDPR are fully up to date. At ICS Electronics Ltd, we take due diligence seriously in regard to all aspects of business, including GDPR. This policy is reviewed and revised at regular intervals to assess its effectiveness in providing data protection to all.

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to ICS Electronics Ltd, Unit V, Rudford Industrial Estate, Ford, Arundel, BN18 0BF or kevin@icselectronics.co.uk.