

# Ultima Newco Ltd Privacy Policy



At Ultima Newco Ltd your privacy is very important to us. We know that there is a lot of information contained within this document, but we want you to be fully informed about your rights and understand how Ultima Newco Ltd handles your data.

## Summary

The data controller is Ultima Newco Ltd. In this policy, " Ultima Newco Ltd ", "we", "us" and "our", refer to Ultima Newco Ltd, registered in the United Kingdom with registered address Perry Road, Harlow, Essex, CM18 7PN. Our company registration number is 09330214.

This policy applies to all brands and websites operated by Ultima Newco Ltd.

## This privacy policy explains:

- What types of personal data we may collect about you when you interact with us and how we will use it.
- How we'll store and handle that data and keep it safe.
- The choices you have, including how to access and update your personal data.
- In addition to this Privacy Policy please take the time to read our Cookies Policy which will also govern your use of our Website.

## Personal information we may collect from you

### 1. When you first contact us:

- Name, address, email address and phone number.

### 2. Additional information we may collect when using our website:

- Information about your browsing behavior, IP address and about the type of device or platform you use (such as a computer or mobile device).
- Information taken from sharing content, e.g. through social media.

### 3. Additional information we may collect when you request a quote or make an order:

- Customer information, Address, Telephone number, e-mail address.
- Details of your order and delivery information.
- Licenses where applicable, for example Microsoft License.
- At time of the order we may require payment card details but rest assured we do not store this financially sensitive information such as card numbers or security information.
- Other communications, such as emails, that relate to the enquiry or Order.

### 4. If you engage with us via our e-newsletter, competitions, promotions:

- Name, address, email address and phone number.
- Enquiry and order history.
- Details of the contents of e-newsletter communications that you have viewed including any links that you clicked on.

## 5. If you engage with us via feedback surveys or questionnaires about our services:

- Details of any feedback you have sent us and contents of customer surveys and questionnaires that you have submitted to us.

## Sensitive personal information definition

Certain categories of personal information, such as that about race, ethnicity, religion, health, sexuality are special categories of data requiring additional protection under European Union and UK data protection law and is referred to here as "sensitive personal information. We would only process sensitive personal information upon your request and with your express consent.

## How we use your Personal Information

We will only use your Personal Information in order to:

- Deliver your Order and ensure that the services you have requested are provided.
- Contact you with regards to your order.
- Help us improve our product offering and to personalize our service to you.
- Help us improve our websites and other online services.
- Conduct internal business and administrative functions.
- Carry out marketing communications (see below).

## When we will send you marketing

- If you have previously enquired about an order with us we may send you marketing communications, including emails, about similar products and services and relevant special offers.
- If you have subscribed to our email newsletter or postal mailings, you will also receive regular emails and a quarterly postal brochure featuring relevant products and special offers.
- You have the opportunity to opt-out of receiving these marketing communications at any time by contacting us by post or email.

## Sharing your personal information

We will not share your details with any third parties for their marketing purposes.

## **We may provide your personal information to third parties where necessary:**

- We may share your personal information with our partner suppliers in order to fulfil your order.
- Credit and charge card companies for the purposes of processing your payment and fraud prevention.
- We also work with carefully selected suppliers that carry out certain functions on our behalf.
- Data processing service providers that we engage for various functions, e.g. to send you our marketing newsletters or run customer surveys on our behalf.
- To comply with legal obligations, e.g. law firms, the police and regulatory authorities.
- Your information may be disclosed to any third-party successors of our business, for example in the event of a merger or sale, for them to use for the purposes as set out in this Privacy Policy.

## **Data Security**

Your data security is of the utmost importance to us and we take appropriate security measures to protect your personal information.

Please be aware that due to the nature of our business and of the internet, information and data you provide may be transferred outside the country where it is submitted to us. If you are submitting information or data from a country within the European Economic Area (EEA) it is possible that it may be transferred outside the EEA, where data privacy regulations may differ from within the EEA.

## **What is our legal basis for using your personal information?**

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the reason or reasons we collected and need to use your information. In most cases the legal basis is likely to be:

- Because you have consented to Ultima Newco Ltd using your information for a particular purpose.
- So that we can process and fulfil your Order and otherwise perform the contract we have with you.
- Because we need to use your personal information to comply with a legal or regulatory obligation.
- To protect the vital interests of you or another person.
- If it is of substantial public interest.

## Your rights

You are entitled to know what Personal Information we hold about you and how that information is processed, this is addressed in this privacy policy. Your rights include the right to:

- request access to the information that we hold about you.
- request that we correct or rectify any information that we hold about you which is inaccurate, incomplete or out of date.
- request to erase or object to processing your personal data.
- ask for your data to be transmitted to a third party.

## If you would like to exercise any of these rights, you can contact us:

- If you change your mind and decide you do not wish to receive email communications from Ultima Newco Ltd, you can unsubscribe.
- You can email us on [alan.laffoley@akhter.co.uk](mailto:alan.laffoley@akhter.co.uk)
- You can write to us at Data Manager, Perry Road, Harlow, Essex, CM18 7PN.

We will update or erase your data as per your request unless we have to keep it for legitimate business or legal purposes. Please note that we reserve the right to retain certain information for our own record-keeping (for example, to ensure that you do not receive marketing communications that you have opted-out of receiving).

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting third party sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

## How long we retain your Personal Information

We will keep your information for as long as we need it for the purpose it is being processed for:

- To provide the services/equipment you have ordered with us.
- As long as we reasonably require for our legitimate interests.
- To comply with any legal and regulatory requirements.

We will actively review the information we hold in line with our data retention policy. We will delete the information securely when necessary, or in some cases anonymize it, when there is no longer a legal, business or customer need for it to be retained.

# Ultima Newco Ltd Privacy Policy



## Contact us

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us via the following methods:

- You can email us on [alan.laffoley@akhter.co.uk](mailto:alan.laffoley@akhter.co.uk)
- You can write to us at Data Manager, Perry Road, Harlow, Essex, CM18 7PN.

We will always attempt to resolve your complaints but you do have the right to contact the Information Commissioner's Office regarding such issues.

## Changes to this Privacy Policy

We keep this Privacy Policy under constant review and it may be subject to amendment at any time to reflect legislative or business practice changes. Any changes will be reflected here and if they are significant, we may indicate this on our website or in certain cases contact you to inform you of these significant updates.

## Cookies Policy

### How we use cookies

A cookie is a small text file that is stored on your computer or other device when you visit a website. They are very widely used in order to make websites function properly, or more efficiently, as well as provide information to the owners of the site.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages people find useful and which not. A cookie in no way gives us access to your computer or any personal information about you, other than the data you choose to share with us. Ultima Newco Ltd uses cookies to collect information about your usage of our website. This helps us to give you the best possible user experience.

When browsing our website, we collect information regarding which pages you have visited so that we may promote relevantly to you at a later time. This is done through a network such as Google Display Network remarketing campaign and means that third party vendors, including Google will show Ultima Newco Ltd ads across the internet. Users may opt out of Google's use of cookies by visiting the Google advertising settings page.

By using the Ultima Newco Ltd websites, you imply consent to the use of cookies. However, if you do not consent to the use of cookies, please ensure that your browser or computer/device is set to reject or prompt before accepting third party cookies. This may prevent you from taking full advantage of the website.

## **Third Party Cookies**

When you visit the Ultima Newco Ltd websites you may notice some cookies that aren't related to Ultima Newco Ltd.

If you go on to a web page that contains embedded content, for example from YouTube, you may be sent cookies from these websites. We do not control the setting of these cookies, so please check the third-party websites for more information about their cookies and how to manage them.

## **Ultima Newco Ltd 'share' tools**

If you take the opportunity to 'share' content from Ultima Newco Ltd websites with friends through social networks - such as Facebook and Twitter - you may be sent cookies from these websites. We don't control the setting of these cookies, so please check the third-party websites for more information about their cookies and how to manage them.

## **Further information about cookies**

If you'd like to learn more about cookies in general and how to control/manage them, please visit "<http://www.aboutcookies.org>." If you'd like to opt out of cookies, please go to the Network Advertising Initiative website. "<http://optout.networkadvertising.org>"

Please note that we are not responsible for the content of external websites.