

PRIVACY POLICY



ESTIMUS Ltd, Unit 3, Commerce Road, Brentford Business Centre, VAT number 278669434, works to protect online privacy of the users. This Policy was written to explain the ways in which your Personal Data is processed in the context of using our Site. The Policy aims to provide you with the information you need in order to give your explicit and informed consent to the processing carried out through the Site and mails, should you agree to it.

Generally your Personal Data that you give to us through different sources, in the context of using the services we offer as defined in Section 3 below, is processed in accordance with the internationally recognised principles of lawfulness, fairness, transparency, data minimisation, accuracy, purpose of storage limitation, integrity and confidentiality.

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1. Data Controller and Data Protection Officer

Estimus Ltd as identified at the beginning of the Policy, is the Data Controller for all of the Personal Data processed through the Site and can be contacted at the following email address: office@estimus.co.uk

2. Personal Data Subject to Processing

Following your use of the Website, the company will process your Personal Data, which may include—in part depending on how you choose to use the Services—identifiers such as your name, surname, address, telephone number, email address, identification number such as customer number, an online identifier or one or more pieces of information about your

physical, physiological, psychic, economic, cultural or social identity that are identifiable or can be used to identify you (hereafter, 'Personal Data').

Your Personal Data can be collected either because you willingly provided it (for example, when you contact us directly, create an account in order to receive the Services offered) or by simply analysing your use of the Site.

The following types of Personal Data are processed through the Site:

1. Name, Contact Details and Other Personal Data

In 'Contact' section of the Site, you will be asked to enter information such as your name, surname, telephone number, email address and etc.

Furthermore, if you participate in a survey or any promotions through the Site, as well as when you communicate with the company through the Site or Customer Service, the company will be able to collect the additional information that you decide to provide.

2. Data voluntarily provided by the data subject

Sometimes you can communicate various kinds of information to the company and this information might contain the Personal Data of other people.

In such a case, you become an independent data controller, assuming all of the relevant legal obligations and responsibilities. In this regard, you fully indemnify us against any complaint, claim, request for damages in consequence of the processing and etc. that the company might receive from the third party whose Personal Data was processed through your use of the Site in violation of applicable personal data protection laws. In any case, should you provide or in some other way process the Personal Data of third parties through your use of the Site, you guarantee from that point forward—assuming all relevant responsibility—that any processing is based on the consent of the third party in question or on other applicable legal grounds that legitimise the processing of the data in question.

3. Browsing Data

The computer systems and software procedures responsible for making this Site function, during the normal course of business, collect some personal data which are transmitted implicitly when using Internet communication protocols. This information is not gathered for the purposes of its association with the identified data subjects, but by its very nature, it could enable the users to be identified when processed and associated with data held by third parties. This category of data includes the IP addresses or domain names of the computers used by visitors to the Site, the addresses of the requested resources in URI (Uniform Resource identifier) form, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code that indicates the status of the response provided by the server (successfully delivered, error and etc.) and other parameters relative to the user's operating system and IT environment. This data is only used to process anonymous statistical information about the use of the Site, to check that it is functioning smoothly and to identify anomalies and/or abuse, and is erased immediately after processing. The data might be used to determine responsibility in the case of computer crimes that damage the site or third parties: apart from this eventuality, data on web contacts is not stored for more than seven days.

3. Purpose of the Processing

The company will use your Personal Data, for the following purposes:

- To send you the newsletter that you requested as a Service by signing up and that contains only informational material and no advertising or provide you with any other Service that you have requested (**Provision of Services**) including, for example, business contacts, technical information downloads, 3D model downloads and etc.
- To send you marketing, promotional and advertising communications, market research and surveys via email, SMS, MMS, paper post, telephone and/or through the company's official pages on social networks; as well as for marketing, in the broad sense, including prize competitions, draws and free gifts with purchase, of products and/or services offered by the company and/or the products and/or services of third parties (**Marketing**).
- To send you marketing communications via email for products and services similar to those that you shown interest in (**Soft Marketing**).
- To create your profile through the use of tracking cookies, if allowed, and so collect and analyse information about your preferences, as well as your overall Site activity if you are a registered user, and so collect information about your questions and browsing activity. This profile will be used to offer you information about other products and/or services that the company thinks might interest you and to show you advertising that might be relevant to your tastes. (**Profile**)
- Discharge legal obligations that require the company to collect and/or further process certain types of Personal Data (**Compliance**).
- Prevent or identify any kind of abusive use of the Site or any fraudulent activity and so permit the company to protect itself in court (**Abuse/Fraud**).

4. Legal Grounds and Obligatory or Voluntary Nature of the Processing

The legal grounds for processing your Data, in accordance with the purposes listed above in Section 3, are the following:

- **Provision of Service**: processing is necessary for this purpose in order to provide you with the Services and, therefore, to fulfil our contract with you. It is not obligatory to provide the company with your Personal Data for this purpose, but if you do not provide it, it will not be possible to provide you with any Services. The same is true for the Service newsletter, which you will receive after specifically requesting it by entering an email address. You can opt out of receiving the newsletter by following the instructions in newsletter mail and Section 8 below.
- **Marketing**: processing for this purpose is based on your consent. It is not obligatory to give your consent for this purpose and you are free to withdraw it at any time without

any consequences (except for no longer receiving marketing communications from the company). You can withdraw your consent by following the instructions in Section 8 below.

- **Soft Marketing**: processing for this purpose is based on the company's interest in sending you marketing communications via email for products and services. You can opt out of receiving these communications, without any consequences (besides no longer receiving communications of this kind from the company) following information in e-mail: using the link at the bottom of each of these emails.
- **Profile**: processing for this purpose is based on your consent. It is not obligatory to give your consent for this purpose and you are free to withdraw it at any time without any consequences (except that you will not benefit from the customisation of the commercial offers that you receive). You can withdraw your consent by following the instructions in Section 8 below.
- **Compliance**: processing for this purpose is necessary for discharging legal obligations. When you provide Personal Data to the company, they must be processed in accordance with the applicable regulations, which might entail their storage and communication to the Authorities to meet accounting, fiscal or other obligations.
- **Abuse/Fraud**: information collected for this purpose will be used solely for preventing and/or identifying possible fraudulent activity or abusive use of the Site and therefore permit the company to protect itself in court.

5. Recipients of Personal Data

Your Personal Data can be shared with the following subjects (the 'Recipients'):

- Subjects who work primarily as data officers or persons, companies or professional firms that provide accounting, administrative, legal, taxation, financial and debt collection assistance and consulting to the company relative to the provision of Services;
- Subjects with whom it is necessary to interact for the provision of Services (for example, email providers);
- Subjects hired to carry out technical maintenance activity (including the maintenance of network equipment and electronic communication networks);
- Persons authorised by the company to process Personal Information as required for actions strictly related to the provision of Services, whether they have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality (e.g. employees);
- Subjects, institutions or authorities to whom it is obligatory to communicate your Personal Data for purposes of Compliance, Abuse or Fraud or by order of the authorities.

6. Transfer of Personal Data

Some Personal Data might be shared with recipients outside the European Economic Area. The company ensures that the processing of Personal Data by such recipients is carried out in accordance with the applicable regulations. In fact, the transfer of data can be based on an adequacy decision or on the Standard Contractual Clauses approved by the European Commission. For more information, please write to the company as instructed in Section 8 below.

7. Storage of Personal Data

Personal Data processed for the purpose of Service Provision will be preserved solely for the time strictly necessary for the fulfilment of concrete purpose (e.g. for managing the contract). In any case, since this Personal Data is processed in order to provide Services, the company may store it for a longer period, in particular since it might be needed for protecting its interests from possible complaints relative to the Services.

Personal Data processed for the purpose of Marketing will be stored until you withdraw your consent. You will be asked periodically to renew your consent. Once you withdraw your consent, the company will no longer use your Personal Data for this purpose, but may continue to store it, in particular for the period necessary to protect its interests from possible complaints based on the relative processing.

Personal Data processed for the purpose of Profile will be stored until you withdraw your consent. You will, however, be asked periodically to renew your consent. Once you withdraw your consent, the company will no longer use your Personal Data for this purpose, but may continue to store it, in particular for the period necessary to protect its interests from possible complaints based on the relative processing.

Personal Data processed for the purpose of Soft Marketing will be stored until you withdraw your consent through the link that you will find at the bottom of every marketing email.

Personal Data processed for the purpose of Compliance will be stored for the period provided for by specific legal obligations or the applicable regulations.

Personal Data processed for the purpose of Abuse/Fraud will be stored for the time strictly necessary for this purpose and in any case as long as the company needs to store it in order to protect itself in court to communicate said data to the competent authorities.

8. Data Subject Rights

You have a right to ask the company, at any time:

- For access to your Personal Data (or a copy of your Personal Data), as well as further information about the way it is being processed;
- To amend or update your Personal Data, should it be incomplete or out of date;
- To erase your Personal Data from the company database;
- To limit the company's processing of your Personal Data;
- To obtain a copy of your Personal Data in a structured, commonly used and machine readable format.

You may also:

- Object to the processing of your Personal Data (e.g. Soft Marketing and Profiling);
- Withdraw your consent for Marketing purposes.

You may withdraw your consent for Marketing relative any time following the instructions indicated in every marketing e-mail using the link found at the bottom of every email of this type).

In addition to the above, you may also exercise your rights writing to the company at the following email address: office@estimus.co.uk

In any case, you always have the right to lodge a complaint with the competent supervisory authority (ICO) should you hold that the processing of your Personal Data does not comply with current regulations.

9. Changes

The company reserves the right to change or simply update its contents, in part or entirely, including due to changes in the applicable regulations. The company will inform you of such changes as soon as they are introduced and they will be binding upon publication on the Website. We therefore ask that you to visit this section regularly in order to stay up to date on the most recent version of the Privacy Policy and therefore stay up to date on the data collected and the way in which the data is used.