

# **Privacy Notice**

#### 1. Introduction

Ecoinomy Limited is a trading name of Ecoinomy Limited which is registered in England & Wales No. 13847478. We are committed to protecting the privacy and security of your personal information. We take care to protect the privacy of our customers and users of our products and or services that communicate [(online or offline) with us, in-store, at events, over the phone, through our mobile applications, websites, and social media platforms.]

We have therefore developed this privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

#### 2. The Information we collect on our website

We only collect information that we know we will genuinely use and in accordance with the General Data Protection Regulation (GDPR). The type of information that we will collect on you, and that you voluntarily provide to us on this website includes:

Your full name
Your email address
Your IP address at the time
Time, and date of information submission
The corresponding statement that you consented to

We may, in further dealings with you, extend this information to include your purchases, services used, and subscriptions, records of conversations and agreements and payment transactions [etc].

You are under no statutory or contractual requirement or obligation to provide us with your personal information; however, we require at least the information above in order for us to deal with you as a customer in an efficient and effective manner. The legal basis for processing your data is based on your specific consent that we will have requested at the point the information was initially provided, therefore we will not store, process, or transfer your data outside the parties detailed above unless we have an appropriate lawful reason to do so.

#### **Contact Form**



The primary instance where our website will ask you for personally identifiable information is our contact form. The contact form specifically, is powered by a popular WordPress plugin called Contact Form 7. Upon completing your information, you will be asked to consent to our data processing policy which is outlined within this document.

Once submitted, your information will be processed and forwarded to us within a single email sent by the website application. Your information will not be stored within the website application's database.

### Hubspot

This website uses HubSpot – an inbound marketing and sales platform to customise content to visitors and adapt how we communicate with them.

HubSpot uses cookies (which are detailed below) and pixel tags to analyse your use of our website. This anonymous information is transferred to and stored in a HubSpot server in the USA. You can learn more about HubSpot's privacy practices by reading their <u>privacy policy</u>.

# Google Analytics

Google Analytics, collects standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

# 3. How we use your information

To contact you, following your enquiry, reply to any questions, suggestions, issues or complaints you have contacted us about;

Make available our products and services to you;

For statistical analysis and to get feedback from you about our products, websites, mobile apps, and other services and activities. For example, occasionally we may invite you to review a product or service you've bought or used from us. If we do, it's possible that we'll use independent research and feedback providers to act on our behalf:

To power our security measures and services so you can safely access our website and mobile apps;



Help us understand more about you as a customer, the products and services you consume, so we can serve you better;

Contact you about products and services from us;

Provide you with online advertising and promotions

Help answer your questions and solve any issues you have.

### 4. Who we might share your information with

We may share your personal data with other organisations in the following circumstances:

If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk); or

From time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. However, all the information we share will be collected and anonymised, so neither you nor any of your devices can be identified from it.

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### 5. How we keep you updated on our business, products and services

### **Email Marketing**

From time to time we may send you relevant offers and news about our business, products and services in a number by email, but **only** if you have consented to receive these marketing communications.

When interacting with our website, you may be asked if you'd like to sign-up to receive our email marketing communications - you will be asked explicitly to opt-in to receiving these.

You can change your Email Marketing subscription anytime by editing your preferences or unsubscribing altogether via the link at the bottom of any of our email marketing communications or by contacting us via the details at the end of this policy.



# 6. Your rights over your information

Right to Access Your Personal Information

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information.

Right to Correction of Your Personal Data

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.

Right to Stop or Limit Our Processing of Your Data

You have the right to object to us processing your personal information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK, where are registered. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

If you would like to exercise any of these above rights, please contact us.

### 7. How long we keep your information for



We retain a record of your personal information in order to provide you with a high-quality and consistent service. We will always retain your personal information in accordance with the General Data Protection Regulation (GDPR) and never retain your information for longer than necessary. Unless otherwise required by law, your data will be stored on our secure database unless otherwise specified by you, or after [our last contact with you/some other identifiable action or period], at which point it will be permanently deleted and therefore unretrievable.

### 8. Your data and Social Networks

When using this website, you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

# 9. Security

Data security is of great importance to Ecoinomy and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including

# **Physical & Managerial Security Procedures**

Limiting access to our buildings to those that we believe are entitled to be there (by use of passes, key card access, and other related technologies);

Implementing access controls to our information technology

We use appropriate procedures and technical security measures (including strict encryption, anonymisation, and archiving techniques) to safeguard your information across all our computer systems, networks, offices and stores.

Never asking you to disclose your own passwords,

Advising you never to enter your account number or password into an email or after following a link from an email.

Website Application and Hosting Security Procedures

HTTPS – This website is secured via Hyper Text Transfer Protocol Secure (HTTPS). It means all communications between your browser and this website are securely encrypted. This means that even if somebody managed to intercept the connection, they would not be able to decrypt any of the data which passes between you and the website.



Secure Update Process – Inline with the security processes of our website development partner agency, this website application's code-base is administered and updated via a password and FTP-free process. All code changes are deployed via a secure process that does not rely on the storage and visible access of passwords. Two-Factor Authentication – Where possible, the administration interface to this website application and any personally identifiable information herein, is secured behind a two-factor authentication login to all staff who have access to it. Additionally, our website development agency can only access the same interface via their secure Google GSuite accounts and hold no password records for accessing the platform at the super-admin level.

Web Application Maintenance – Our organisation, working in collaboration with our website development agency, regularly monitors the security of this website and consistently updates the core CMS platform and supporting extensions and plugins.

Cloudflare – Our website's DNS is managed through GoDaddy who provide our content delivery network (CDN), DDoS attack mitigation, Internet security, and distributed domain name server services.

### 10. Cookies used by this website

#### What are Cookies?

Cookies are small pieces of data, stored in text files, that are stored on your computer or another device when a website is loaded within your chosen browser. They are widely used to 'remember' you and your preferences, either for a single visit (through a 'session cookie') or for multiple repeat visits (using a 'persistent cookie'). They ensure a consistent and efficient experience for visitors, and perform essential functions such as allowing users to register and remain logged in. Cookies may be set by the site that you are visiting (known as 'first party cookies'), or by other websites who serve up content on that site ('third party cookies').

#### What is Cookie Control?

You may notice that our website utilises a third party Cookie preference tool called 'Cookie Control'. Cookie Control is a mechanism for controlling user consent and the use of cookies on this website application.

When (as the user) you consent to one of the optional cookie categories, Cookie Control will place a cookie to remember that decision. The name of the cookie will be the name of the category specified within the Cookie Control widget itself. That cookie will be removed when you (the user) revoke consent to that category.



# What are 'Strictly Necessary Cookies'?

These are the cookies that are essential for this website to perform its basic functions. These include those required to allow registered users to authenticate and perform account-related functions, as well as to save the contents of virtual 'carts' on sites that have an e-commerce functionality.

The most popular web browsers typically provide additional tools to users for controlling or restricting cookies on their device. To find out more about cookies, including how to see what cookies have been set, you can visit www.aboutcookies.org.

To opt out of being tracked by Google Analytics across all websites, visit https://tools.google.com/dlpage/gaoptout.

### 11. How to contact us

If you would like to exercise one of your rights as set out earlier in this policy, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us at <a href="mailto:info@ecoinomy.io">info@ecoinomy.io</a>

Thank you for taking the time to read our Privacy Policy.