

# PRIVACY POLICY

## 10:10 Ventures Limited

### 1. Your data – what is it?

Your data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR"). We hold the following data on file. Your business data is retained on our SAGE operational data base and comprises of your Business Address, Invoice Address, Delivery Address, Known Company Trade Contacts, Accounts Contacts, Business Telephone Numbers, Business Mobile Telephone Numbers, and Business Email Addresses. No customer personal data is saved, unless specifically instructed in writing by a client for special delivery and invoice preferences. This can be safely destroyed at any time on receipt of written instruction.

### 2. Who are we?

10:10 Ventures Limited ("the business") is the data controller. This means it decides how your data is processed and for what purposes. "We", "us" and "our" in this policy refer to 10:10 Ventures Limited. "Our website" in this policy also includes the plural, as some projects/campaigns have their own separate site/pages.

### 3. How do we process your data?

10:10 Ventures Limited complies with its obligations under the "GDPR" by keeping data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect data.

We use your data for the following purposes: -

- To promote the products and services of 10:10 Ventures Limited;
- To administer customer and employee records;
- To manage our employees;
- To maintain our own accounts and records;
- To inform you of news, events, and activities of 10:10 Ventures Limited and to acknowledge your orders/purchases and answer your requests/enquiries.

### 4. What is the legal basis for processing your data?

- Explicit consent from you so that we can keep you informed about news, events, products and services;
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out business aim provided: -
  - the processing relates customers, former customers or prospect customers, whom have consented (or those who have regular contact with it in connection with those purposes); and
  - there is no disclosure to a third party without consent.

### 5. Sharing your data

Your data will be treated as strictly confidential and will only be shared with other members of 10:10 Ventures Limited or our data processors in connection with the organisation's work and strictly under the conditions of this Privacy Policy. We will only share your data with other third parties with your consent.

Information about our customer is an important part of our business, and we're not in the business of selling it to others. 10:10 Ventures Limited shares customer information only as described below, with our affiliates

- Data Processors -Our data is processed in-house and is not given to third parties.
- Protection of 10:10 Ventures Limited and Others: We release account and other data when we believe release is appropriate to comply with law; enforce or apply our Terms and Conditions and other agreements; or protect the rights, property, or safety of 10:10 Ventures Limited, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and

credit-risk reduction. Obviously, however, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from Customers for commercial purposes in violation of the commitments set forth in this Privacy Policy.

- With Your Consent: Other than as set out above, you'll receive notice when information about you might go to third parties, and you'll have an opportunity to choose not to share the information.

**Please note:**

- It's important for you to protect against unauthorized access to your password and your computer. Be sure to sign off when you've finished using a shared computer.

Whenever we transfer data to countries outside of the European Economic Area in the course of sharing information as set out above, we will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by the applicable laws on data protection.

## **6. Use of Cookies**

10:10 Ventures Limited website uses cookies to better the users experience while visiting the website. Where applicable our website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within the website. Users are advised that if they wish to deny the use and saving of cookies from our website on to their computer's hard drive they should take necessary steps within their web browser's security settings to block all cookies from our website and its external serving vendors.

Our website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics through 1&1 website server which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect your data. You can read Google's privacy policy here for further information [<http://www.google.com/privacy.html>].

Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

## **7. How long do we keep your data?**

We keep data only as long as it's required or remains of use. You can ask us to withdraw or remove your data at anytime.

## **8. Your rights and your data**

Users contacting our website and/or 10:10 Ventures Limited do so at their own discretion and provide any such data requested at their own risk. Unless subject to an exemption under the GDPR, you have the following rights with respect to your data, A response must be given within 30 days: -

- The right to request a copy of your data which 10:10 Ventures Limited holds about you;
- The right to request that 10:10 Ventures Limited corrects any data if it is found to be inaccurate or out of date;
- The right to request your data is erased where it is no longer necessary for 10:10 Ventures Limited to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide you with a copy of your data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- The right, where there is a dispute in relation to the accuracy or processing of your data, to request a restriction is placed on further processing;

- The right to object to the processing of data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioners Office.

Please note, however, that we reserve the right to request evidence of identity before responding to a request for information, to avoid disclosing data to a fraudulent enquirer who may be seeking information about you.

## **9. Email Newsletter**

We operate an email newsletter program, used to inform subscribers about products, services, news and events. Users can subscribe through using a form on our website contact us page, should they wish to do so but this is at their own discretion. You will receive email newsletters as part of being a customer of KOBOLD Instruments where it is established there is 'legitimate interest' in contacting you. Some subscriptions may be manually processed through prior written agreement with the user.

Subscriptions are taken in compliance with UK Spam Laws detailed in the Privacy and Electronic Communications Regulations 2003. All data relating to subscriptions are held securely and in accordance with the Data Protection Act 1998. No data are passed on to third parties nor shared with companies / people outside of the company that operates our website.

Under the General Data Protection Regulations, you may request a copy of the data held about you by our email newsletter program. If you would like a copy of the information held on you please write to the business address at the bottom of this policy.

Email marketing campaigns may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include (but not restricted to): the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity. This information is used to refine future email campaigns and supply the user with more relevant content based around their activity. In compliance with UK Spam Laws and the Privacy and Electronic Communications Regulations 2003 subscribers are given the opportunity to un-subscribe at any time through an automated system. This process is detailed at the footer of each email campaign. If an automated un-subscription system is unavailable clear instructions on how to un-subscribe will be detailed instead.

## **10. External Links**

Although our website sets out to include only quality, safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links mentioned throughout our website. (External links are clickable text / banner / image links to other websites). We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note that they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

## **11. Adverts and Sponsored Links**

Our website may contain sponsored links and adverts. These will typically be served through our advertising partners, who may have detailed privacy policies relating directly to the adverts they serve. Clicking on any such adverts will send you to the advertiser's website through a referral program which may use cookies and will track the number of referrals sent from our website. This may include the use of cookies which may in turn be saved on your computer's hard drive. Users should therefore note they click on sponsored external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

## **12. Social Media Platforms**

Communication, engagement and actions taken through external social media platforms such as; LinkedIn are used by 10:10 Ventures Limited on are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users of this associated media are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and data.. We will never ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact us through primary communication channels such as by telephone or email. Our website may use social sharing buttons which help share web content directly from web pages to the social media platform in question.

Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

### **13. Shortened Links in Social Media**

We, through our social media platform accounts, may share web links to relevant web pages. By default some social media platforms shorten lengthy web addresses (known as URLs) - for example: <http://bit.ly/zyVUBo>. Users are advised to take caution and good judgement before clicking any shortened URLs published on social media platforms. Despite the best efforts to ensure only genuine URLs are published many social media platforms are prone to spam and hacking and therefore our website and 10:10 Ventures Limited cannot be held liable for any damages or implications caused by visiting any shortened links.

### **14. Further processing**

If we wish to use your data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **15. Contact Details**

To exercise all relevant rights, queries or complaints please in the first instance contact us at **Address 10:10 Ventures Limited, New Inn, 3 The Locks, Hillmorton Rugby CV21 4PP Phone: [0121 288 06021](tel:012128806021) Email: [enquiries@happy-apple.co.uk](mailto:enquiries@happy-apple.co.uk)**

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

### **Resources & Further Information**

- ☞ Data Protection Act 1998
- ☞ Privacy and Electronic Communications Regulations 2003
- ☞ Privacy and Electronic Communications Regulations 2003 - The Guide
- ☞ Twitter Privacy Policy
- ☞ Google Privacy Policy
- ☞ LinkedIn Privacy Policy
- ☞ Dotmailer Privacy Policy

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