



PRIVACY AND COOKIES POLICY

Version number: 1.0

Effective date: 1/1/2020

1. Who are we?

1.1 We are Zenron Service Ltd trading as “Zenron”. For privacy queries, you can contact us at info@zenron.co.uk. Other contact details are on our website.

2. What’s the point of this policy?

2.1 It tells you what to expect when we collect your personal information via our website. Please only use our service if you are completely happy with this policy.

2.2 Generally, the policy covers only information provided to us. If you give personal information to other people, such as payment providers or other websites, please check their privacy policies.

3. Might the policy change?

3.1 Yes. Please check it whenever you visit our website. We will assume you agree to the new version of the policy if you use the site after its effective date. We may also notify you of any changes by email or in-service message.

4. What do we collect?

4.1 Information which you upload to our service or otherwise give us such as:

- your name and contact details;
- information which you include in messages sent via our service and/or communications with us; and
- contact or other information which you give or allow us to use for newsletters or other marketing.

4.2 Automated information about your use of our service such as: the internet protocol (IP) address used to connect your device to the internet, connection information such as browser type and version, information about your device including device-type and device identifier, operating system and platform, mobile network data, a unique

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reference number linked to the data you enter on our system, login details, the site from which you arrived at our service, details of your activity with date / time stamps including pages you visited and your searches / transactions.

- 4.3 The following information about you may be provided to us by other people:
- Limited billing information sent to us by our payment provider for verification purposes e.g., your name, email address and billing address.

5. What's our reason / legal basis for collecting the information?

- 5.1 Because it's necessary to take steps at your request to enter into a contract with you and/or to perform such a contract. This applies to initial enquiries and contact.
- 5.2 Because it's in our "legitimate interests", e.g., to manage and improve our service including tracking usage patterns and preventing or detecting fraud or abuse. This applies to automated usage data.
- 5.3 Because you've specifically agreed on our service (e.g, by ticking a consent box). This applies to contact or other information which you give or allow us to use for newsletters or other marketing. You can withdraw permission at any time as explained on our service or by emailing us at the above email address.

6. How long do we keep personal information?

- 6.1 For 12 months if you don't enter into a contract with us during that time or, if you do contract with us, we will hold your information until our contract with you has ended.
- 6.2 We may hold on to some of your information for longer (typically up to six years) if reasonably needed for legal, regulatory or tax reasons, deal with disputes, prevent fraud or abuse and/or enforce our terms and conditions.
- 6.3 We will keep your information which we use only for newsletters or other marketing until you tell us to stop sending you such messages.

7. To whom do we send or make available your personal information?

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- 7.1 To other people who supply us with a service, e.g. website hosts, and businesses which help us send communications or monitor our website and which provide us with e-commerce, online advertising, analytics and other IT services.
- 7.2 To regulators, the police and other law enforcement authorities to help deal with fraud and abuse and/or comply with legal requirements.
- 7.3 To insurers and professional advisers in connection with our insurance cover or to deal with legal claims.
- 7.4 To potential buyers so far as reasonably necessary, in the case of an actual or proposed (including negotiations for a) sale or merger or business combination involving all or the relevant part of our business.

8. Do we send your information outside the EU?

- 8.1 Your personal information which we collect is stored within the EU and is not transferred to any third countries except as follows.
- 8.2 Your personal information (e.g., IP address, browsing information, email address) may be transferred to the US by the following companies: Google / Facebook (analytics / advertising) . Transfer is generally on the basis of contracts with EU-mandated standard contractual clauses designed to provide adequate safeguards for your personal information. Some of these companies were certified under the EU-US Privacy Shield Framework which is no longer applicable due to a court decision; we understand that the authorities are working on a replacement and we aim to update our policy to reflect this in due course.

9. What rights do you have?

- 9.1 If the legal requirements are met: To ask us for access to your personal information, to rectify it if there are mistakes, to delete or restrict its use in certain circumstances or to “data portability” or to withdraw any consent you’ve given (e.g. marketing).
- 9.2 You may also have the right to object to use of your personal information in certain circumstances.

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- 9.3 If you have a complaint about how we are dealing with your personal information, please contact us via the email address above. If you are not happy with our response or think we are not handling your personal information in accordance with the law, you have the right to complain to the Information Commissioner's Office (ICO).
- 9.4 For more information about your rights, visit the ICO's website: www.ico.org.uk.

10. What about cookies?

- 10.1 Cookies and other tracking technologies are used on our website. A cookie is an identifier (a small file of letters and numbers) that is sent to your web browser. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website owner or others. Some are session temporary "session" cookies that remain in the cookie file of your browser only until your browser is closed. Whereas persistent cookies stay for longer (depending on the lifetime of the specific cookie). For further information on cookies, including how to use your browser to block them and how to delete existing cookies, visit: www.allaboutcookies.org. Our site's functionality will be limited if you configure your browser to reject cookies.
- 10.2 Companies which provide us with a service place cookies. Some of these cookies (e.g. from Google) may involve certain information, such as your IP address and web address of the page you're visiting, being sent to the company concerned. Below is a summary of the kinds of cookies used together with details about who places them and where you can go to get more information and to opt out (where possible):

- **Analytics cookies:** These kinds of cookies recognise and count the number of website visitors as well as providing other information about the visit such as duration, route through the website and where the visitor came from. This information helps us to improve the way our website works, for example by making sure users find what they need easily. These cookies are provided by:
 - *Google Analytics ("GA").* More information:
 - Google's [overview of GA data practices and safeguarding](#)
 - how to specifically [opt out from GA cookies](#)
 - Google's [use of its partners' data](#)

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- **Advertising cookies:** These kinds of cookies are typically used to personalise ads on this or other sites based on your use of our site, to measure ad effectiveness (for example, how often you click on or view ads and whether you go on to buy something from the advertiser) and to stop you being shown the same ad repeatedly. These cookies are provided by:
 - *Google (including Analytics Ad Features / AdSense / Doubleclick)*
 - how Google [uses cookies and other technologies in advertising](#) including how to opt out of advertising cookies (this explains how ad personalisation works)
 - Google's [use of its partners' data](#)
 - *Facebook (including "Facebook Pixel")*
 - Facebook's [cookies policy](#) (see especially under "Advertising, recommendations, insights and measurement") including how to control Facebook's use of cookies
 - Facebook's [privacy policy](#)

Note that there are various places where you can go to opt out of many companies' advertising cookies in one go including some or all of the above:

- www.networkadvertising.org/choices
- <http://www.youronlinechoices.com/>
- <http://optout.aboutads.info>

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