

Privacy Notice

Who We Are

Zephyr Technologies Ltd gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Zephyr Technologies Ltd registered office is at 50 Seymour Street, London, W1H 7JG and we are a company registered in England and Wales under company number 5193212. We are registered on the Information Commissioner's Office Register; registration number ZA480278, and act as the data controller and data processor when processing your data. Our Appointed Person can be contacted at info@zephyruk.com or Ray Theara at 50 Seymour Street, London, W1H 7JG.

Information That We Collect

Zephyr Technologies Ltd processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The types of personal data that we collect could collect are (but not limited to): Name, Date of Birth, Home Address, Personal Email, Business Email, Home Telephone Number, Mobile Telephone Number, National Insurance Number, Passport Number, CCTV, audio recordings, Photo IDs, Special Category Data.

We collect information through providing our services, directly from the data subject or from third party subjects who are fulfilling contractual obligation on behalf of the data subject.

How We Use Your Personal Data (Legal Basis for Processing)

Zephyr Technologies Ltd take your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. ***The purposes and reasons for processing your personal data are detailed below: -***

- *We collect your personal data in the performance of a contract or to provide a service. We use the data in assisting to completing transactions and orders of our services, administering your account, processing payments.*
- *We collect and store your personal data as part of our legal obligation for business accounting and tax purposes, and business operations.*
- *For compliance with applicable laws, regulations, court orders, government and law enforcement requests, to operate our services and products properly and to protect ourselves, our users and our customers and to solve any customer disputes.*
- *Communicating with you about our services. This could be responding to your enquiries or requests, service completion, communications required by law or applicable corporate updates related to mergers, acquisitions or divestitures.*
- *We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests*
- *Maintaining the security of our websites, products, features and services and preventing and detecting security threats, fraud or other criminal or malicious activity that might compromise your information. When you interact with us, we will also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your personal data. We may also maintain additional security measures, such as CCTV, to safeguard our physical locations.*

Your Rights

You have the right to access any personal information that **Zephyr Technologies Ltd** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. **Zephyr Technologies Ltd** use third parties to provide selected services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

We will only share your personal data as follows and, when applicable, only with the appropriate contractual obligations in place:

Sharing with service providers and Partners:

We engage service providers or Partners to manage or support certain aspects of our business operations on our behalf. These service providers or partners may provide services such as accounting, payroll, business taxation for HMRC, credit card processing and fraud management services, human resources consultancy, product delivery, advertising and marketing activities (including digital and personalized advertising), IT services, debt collection and management or support of **Zephyr Technologies Ltd** websites/hosting. Our service providers and partners are required by contract to safeguard any personal data they receive from us and are prohibited from using the personal data for any purpose other than to perform the services as instructed by **Zephyr Technologies Ltd**. We also take steps to provide adequate protection for any transfers of your personal data in accordance with applicable law such as signing EU Standard Contractual Clauses with the service provider or partner, relying on their Privacy Shield certification, other approved codes of conduct or certification mechanisms or binding and enforceable commitments of the service provider.

Sharing with third parties:

We may also share your personal data with: (i) credit reference and fraud prevention agencies; (ii) debt collection agencies (for outstanding debts with us); or (iii) insurance providers if you have purchased an insurance policy through **Zephyr Technologies Ltd**. If you choose to provide personal data to the other companies, that personal data will be handled according to the privacy policy of those companies, which may differ from **Zephyr Technologies Ltd**' policies and practices.

Corporate Transactions

Circumstances may arise where, whether for strategic or other business reasons, **Zephyr Technologies Ltd** decides to sell, buy, merge or otherwise reorganise businesses. In such transactions, we may disclose or transfer your personal data to prospective or actual purchasers or receive personal data from sellers. Our practice is to seek appropriate protection for your personal data in these types of transactions.

Compliance with Law

We may also share your personal data when we believe, in good faith, that we have an obligation to: (i) respond to duly authorized information requests of law enforcement agencies, regulators, courts

and other public authorities, including to meet national security or other law enforcement requirements; (ii) comply with any law, regulation, subpoena, or court order; (iii) investigate and help prevent security threats, fraud or other criminal or malicious activity; (iv) enforce/protect the rights and properties of **Zephyr Technologies Ltd** or its subsidiaries; or (v) protect the rights or personal safety of **Zephyr Technologies Ltd**, our employees, and third parties on or using **Zephyr Technologies Ltd** property when allowed and in line with the requirements of applicable law.

Safeguarding Measures

Zephyr Technologies Ltd take your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including SSL, TLS, encryptions, restricted access, IT authentication, firewalls, anti-virus/malware.

Transfers Outside the EU

Zephyr Technologies Ltd utilise some services (*or parts of them*) that may be hosted/stored in non EU countries which means that we may transfer any information which is submitted by you through the e-mail outside the European Economic Area ("EEA") for the below purposes: - to fulfill **Zephyr Technologies Ltd**.

Where this is the case, we will take steps to ensure the necessary level of protection for your information and abide by strict agreements and measures set out by **Zephyr Technologies Ltd** to protect your data and comply with the relevant data protection laws.

Consequences of Not Providing Your Data

[if relying on statutory/contractual requirement basis]

You are not obligated to provide your personal information to IngWE Services, however, as this information is required for us to provide you with our services and for business continuity. Therefore, we will not be able to offer some/all our services without it.

Legitimate Interests

As noted in the *'How We Use Your Personal Data'* section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing **name, email address** and have identified that our interests are important corporate announcements, product and services updates.

How Long We Keep Your Data

Zephyr Technologies Ltd only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Special Categories Data

Owing to the products, services or treatments that we offer, **Zephyr Technologies Ltd** sometimes needs to process sensitive personal information (*known as special category data*) about you, as a part of providing our services. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, the Data Controller will obtain your explicit consent through a signature. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

Marketing

Occasionally, **Zephyr Technologies Ltd** would like to contact you with the updates on our services and that we provide. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting directly on info@zephyruk.com

Lodging A Complaint

Zephyr Technologies Ltd only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Ray Theara
Zephyr Technologies Ltd
50 Seymour Street, London, W1H 7JG
info@zephyruk.com

Complaints Department
Information Commissioners Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF T.
Helpline on 0303 123 1113.
www.ico.org.uk

Cookie Notice

A **'cookie'** is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services.

Hard Copy Consent:

Zephyr Technologies Ltd take your privacy seriously and will only process your personal data with your consent and in accordance with the terms stated in our Privacy Notice.

Please review our privacy notice in full. If you consent to us collecting and processing your personal data, please sign and date below:

Name: _____

Date: _____

Signature: _____

Electronic Consent:

Zephyr Technologies Ltd take your privacy seriously and will only process your personal data with your consent and in accordance with the terms stated in our Privacy Notice.

Please review our privacy notice in full. If you consent to us collecting and processing your personal data, please tick the box below: