

PENNANT PRIVACY POLICY

INTRODUCTION

Pennant International Group PLC (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy applies to our website, products and services provided by us and explains how we collect, use, disclose, and safeguard your information when you visit our website. This includes any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”). Please read this privacy policy carefully.

We are committed to protecting your personal data and we ensure that we use your information only in accordance with the applicable law concerning the protection of your personal data. Generally, you can visit the Site without disclosing any personal information about you. However, there may be times when we require personal information about you or when you wish to disclose such personal information to us. If you do not agree with the terms of this privacy policy, please do not access the Site.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site after the date such revised Privacy Policy is posted.

For the purpose of data retention, we will retain the information specified below for a period of 10 years, with Google Analytics data (user-level and event-level data associated with cookies, user-identifiers and advertising identifiers) for a period of 26 months.

COLLECTION OF YOUR INFORMATION

We may collect information about you in the following ways;

Information you give us – you may complete an enquiry form, participate in various activities related to our Site, or correspond with us by phone, email or otherwise. The information you give us may include your name, email address, address or location and your phone number. You are under no obligation to provide us with personal information of any kind, however your refusal to do so may prevent you from using certain features of the Site.

Information we collect – our servers automatically collect data when you access our Site, such as your IP address, your browser type, your operating system, your access times, time zone setting, the pages you have viewed directly before and after accessing the Site.

Information about your visit – this could include your clickstream to, through and from the Site, products or pages you have viewed, page response times, website errors, length of visit.



If you access our Site via a mobile device, we will also collect additional information regarding your device, such as the model, manufacturer and device ID.

TRACKING TECHNOLOGIES

Cookies

We may use cookies and other tracking technologies to help customise the Site and improve your experience. Cookies also help to distinguish you from other users by storing a small file of letters and numbers on your browser or hard drive of your computer if you agree.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies you may not be able to access all or parts of the Site.

Website Analytics

We may also partner with selected third-party vendors, such as Google Analytics, to allow tracking technologies and remarketing services on the Site. The use of Google Analytics enables us to analyse and track users' use of the Site, determine the popularity of certain content and better understand online activity. By accessing the Site, you consent to the collection and use of your information by Google Analytics. You are encouraged to review their privacy policy and contact them directly if you have any questions.

USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customised experience. Specifically, we may use information collected about you via the Site to:

- fulfil our obligations under any contract we have entered into with you and to provide you with information, products and services you have requested
- deliver targeted advertising, newsletters, and other information if you have consented to us doing so
- Notify you of products and services we offer that are similar to those you have enquired about
- notify you of other products and services we feel may interest you
- notify you of changes to our services and products
- to better understand how people interact with our Site
- Increase the efficiency and operation of the Site
- Monitor and analyse usage and trends to improve your experience with the Site
- Perform other business activities as needed.
- Request feedback and contact you about your use of the Site
- Resolve disputes and troubleshoot problems.
- Respond to product and customer service requests.

DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you;



- with third parties that perform services for us or on our behalf, including data analysis, email delivery, hosting services, customer service, and marketing assistance.
- If we sell any or all of our business or assets, or we buy another business in which we may disclose your personal data to the prospective buyer or seller
- If we are under a legal duty to comply with any legal obligation or in order to enforce or apply our terms and conditions
- with our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

SECURITY OF YOUR INFORMATION

Protecting your security and privacy is important to us and we make every effort to secure your information and maintain your confidentiality in accordance with the terms of the Data Protection Legislation. The Site is protected by various levels of security technology, which are designed to protect your information from any unauthorised or unlawful access, processing, accidental loss, destruction and damage.

We will do our best to protect your personal data but the transmission of information via the Internet is not completely secure. Any such transmission is therefore at your own risk.

WHERE WE STORE YOUR PERSONAL DATA

Given that the Internet is a global environment, using it to collect and process personal data may involve the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the European Economic Area, although the data will always be held securely and in line with the requirements of UK data protection legislation. By communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

YOUR RIGHTS

At any point while we are in possession of your personal data, you have the following rights under GDPR:

- Your right of access (you have the right to ask us for copies of your personal information)
- Your right to rectification (you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete)
- Your right to erasure (you have the right to ask us to erase your personal information in certain circumstances)
- Your right to restriction of processing (you have the right to ask us to restrict the processing of your personal information in certain circumstances)
- Your right to object to processing (you have the right to object to the processing of your personal information in certain circumstances)
- Your right to data portability (you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances)



You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

HOW TO CONTACT US OR COMPLAIN

If you wish to make a request regarding your data, please email us on the address below, specifying which request you are making in the subject header. If you have any concerns about our use of your personal information, you can contact us or make a complaint to us via;

Email	Post
sales@pennantplc.co.uk	Data Protection Contact Pennant International Ltd Pennant Court (Head Office) Staverton Technology Park Cheltenham Gloucestershire GL51 6TL

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>