#### PRIVACY AND COOKIES POLICY

Version number: 1.0

Effective date: 17th December 2018

#### 1. Who are we?

1.1 We are Vital Direct Ltd trading as BuildingHandbook.com. For privacy queries, you can contact us at info@vitaldirect.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. Nor does this policy apply to personal information of other people included in documents and other data uploaded to our service. We just act as "data processors"; our legal obligations are set out in our contract with those service users, who are the "data controllers".

## 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, contact details and any other personal information provided when you register with us;
  - details about your transactions on our service;
  - contact or other information which you give or allow us to use for marketing;
     and
  - your communications with us.
- 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 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.

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

Because it's necessary to take steps at your request to enter into a contract with you and/or to perform such a contract, e.g., send service messages. This applies to initial enquiries and to contact and transaction details.

- 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 agreed. This applies to contact or other information which you give or allow us to use for 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 We will hold on to your information for 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.
- 6.2 We will keep your information which we use only for marketing until you tell us to stop sending you such messages.

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

- 7.1 To other people who supply us with a service, e.g. other companies in our group who provide part of our service, website hosts, businesses which help us send communications or monitor our website and which provide us with e-commerce and other IT services (see information about Google reCAPTCHA below).
- 7.2 To credit reference agencies, regulators and 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 European Union?

- 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 may be transferred to the US by the following companies certified under the <u>EU-US Privacy Shield Framework</u>, which provides certain safeguards for your personal information: Google (Recaptcha service).

## 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.

- 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 We and/or other companies use cookies and other tracking technologies 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 We ourselves place the following types of cookies:

Type of cookies	Purpose
Preferences	Store information about the preferences you've selected (eg
	favourites, currency, wishlists) and personalise the site
Security	Provide security-related features to protect our site, for example
	to help stop fraudulent logins
Cookie notice	Store your response to our cookie notice

- 10.3 Companies which provide us with a service also 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):
  - Google reCAPTCHA service: This service helps us work out whether a user is a "robot" or a real person. As part of this service Google places cookies on your computer and collects information, which we understand includes: a snapshot of your browser window when you click the "I'm not a robot" box, the number of previous mouse clicks on that screen and details cookies previously placed by Google on your computer. More information:
    - general information about the types of cookies placed by Google
    - Google's <u>use of its partners' data</u> including how to control information collected by Google
    - Google's privacy policy