

## PRIVACY POLICY

We take Privacy seriously. And simply. We only want to know how you use our website. We're not interested in selling your data. But in case you're concerned, here's the legal bit...

Effective from 25 May 2018.

Smarts cares about and respects your privacy. If at any time you have questions about our practices or any of your rights described below, you may reach our Data Protection Officer ("DPO") and our dedicated team by contacting us at [privacy@smarts.agency](mailto:privacy@smarts.agency)

This inbox is actively monitored and managed so that we can provide you with information you can confidently trust.

This page informs you of our policies regarding the collection, use and disclosure of Personal Information when you use our Service.

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information for providing and improving the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

The following terminology applies to this Privacy Policy and any or all

Agreements: "Client", "You" and "Your" refers to you, the person accessing this website and accepting the Company's terms and conditions. "The Company", "Ourselves", "We" and "Us", refers to our Company. "Party", "Parties", or "Us", refers to both the Client and ourselves, or either the Client or ourselves. All terms refer to the offer, acceptance and consideration of payment necessary to undertake the process of our assistance to the Client in the most appropriate manner, whether by formal meetings of a fixed duration, or any other means, for the express purpose of meeting the Client's needs in respect of provision of the Company's stated services/products, in accordance with and subject to, prevailing Northern Ireland Law. Any use of the above terminology or other words in the singular, plural, capitalisation and/or he/she or they, are taken as interchangeable and therefore as referring to same.

## INFORMATION COLLECTION AND USE

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, your email address, name (“Personal Information”).

## SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## COMMUNICATIONS

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

## SECURITY

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. As such we make no warranties as to the level of security afforded to your data, except that we will always act in accordance with the relevant UK and EU legislation.

## INTERNATIONAL TRANSFER

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the information, including Personal Information, to United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

In the event that a dispute arises with regards to the international transfer of data, you agree that the courts of Northern Ireland, Scotland, England and Wales shall have exclusive jurisdiction over the matter.

## JURISDICTION

This Policy shall be governed and construed in accordance with the laws of Northern Ireland, Scotland, England and Wales, without regard to its conflict of law provisions.

## PRIVACY STATEMENT

We are committed to protecting your privacy. Authorized employees within the company on a need to know basis only use any information collected from individual customers. We constantly review our systems and data to ensure the best possible service to our customers. Parliament has created specific offences for unauthorised actions against computer systems and data. We will investigate any such actions with a view to prosecuting and/or taking civil proceedings to recover damages against those responsible.

## CONFIDENTIALITY

We are registered under the Data Protection Act 1998 and as such, any information concerning the Client and their respective Client Records may be passed to third parties. However, Client records are regarded as confidential and therefore will not be divulged to any third party, other than [our manufacturer/supplier(s) and] if legally required to do so to the appropriate authorities. Clients have the right to request sight of, and copies of any and all Client Records we keep, on the proviso that we are given reasonable notice of such a request. Clients are requested to retain copies of any literature issued in relation to the provision of our services. Where appropriate, we shall issue Client's with appropriate written information, handouts or copies of records as part of an agreed contract, for the benefit of both parties. We will not sell, share, or rent your personal information to any

third party or use your e-mail address for unsolicited mail. Any emails sent by this Company will only be in connection with the provision of agreed services and products.

## LOG FILES

We use IP addresses to analyse trends, administer the site, track user's movement, and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information. Additionally, for systems administration, detecting usage patterns and troubleshooting purposes, our web servers automatically log standard access information including browser type, access times/open mail, URL requested, and referral URL. This information is not shared with third parties and is used only within this Company on a need-to-know basis. Any individually identifiable information related to this data will never be used in any way different to that stated above without your explicit permission.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this type of information in order to increase our Service's functionality. These third party service providers have their own privacy policies addressing how they use such information.

## COOKIES

Like most interactive web sites this website uses cookies to enable us to retrieve user details for each visit. Cookies are used in some areas of our site to enable the functionality of this area and ease of use for those people visiting. Some of our affiliate partners may also use cookies.

We use cookies which are tiny files that we store on your computer. They help us identify you from other users and allow us to give you the best experience when you visit our website.

## TYPES OF COOKIES

To help you understand more about our cookies, we have divided our cookies into four categories based on the guidance of the International Chamber of Commerce.

**Strictly Necessary Cookies** – These cookies are essential for operation of the website. They don't collect any personal information about you. They may include, for example, logging into secure areas of the website, use of a shopping basket or using e-billing services.

**Analytical Cookies** – These cookies allow us to monitor the behavioural activity of our users. They don't collect any personal information about you. We use these cookies to help us to improve the way our website works for you. Types of information they collect include, for example how many visitors to the website or which pages they had come from previously.

**Functionality Cookies** – These cookies allow us to personalise your experience and recognise when our users return to our website. They may provide services which include, for example, choice of layout.

**Targeting Cookies** – These cookies record a user's visit to a website, the individual pages visited and links followed. These cookies may be set by a third party and may be used to target users for online advertising.

Below is a table of the cookies we actually use on our website. You will find more information on each one and their specific purpose.

Cookie	Google Analytics
Name	_utma
Type	Measurement
Purpose	This is a popular tool where the cookies collect anonymous information about users and how they use our website. Typical information it collects would include how many visitors we get to the website and how long visitors stay on our website. <a href="#">More information</a>
Cookie	Facebook Pixel
Name	_fbp
Type	Measurement
Purpose	This cookie is set by Facebook to deliver advertisement when they are on Facebook or a digital platform powered by Facebook advertising after visiting this website. <a href="#">More information</a>

This cookie is set by Facebook to deliver advertisement when they are on Facebook or a digital platform powered by Facebook advertising after visiting this website. More information

Sometimes, third parties manage some of our cookies, but we don't allow the third party to use the cookies for any purpose other than those listed above.

### MORE INFORMATION ON COOKIES

If you require more information on cookies, and how to disable or delete them go to <http://www.aboutcookies.org/>

### LINKS FROM THIS WEBSITE

We do not monitor or review the content of other party's websites which are linked to from this website. Opinions expressed or material appearing on such websites are not necessarily shared or endorsed by us and should not be regarded as the publisher of such opinions or material. Please be aware that we are not responsible for the privacy practices, or content, of these sites. We encourage our users to be aware when they leave our site & to read the privacy statements of these sites. You should evaluate the security and trustworthiness of any other site connected to this site or accessed through this site yourself, before disclosing any personal information to them. This Company will not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure to third parties of personal information.

### COPYRIGHT NOTICE

Copyright and other relevant intellectual property rights exists on all text relating to the Company's services and the full content of this website.

### COMMUNICATION

We have several different e-mail addresses for different queries. These, & other contact information, can be found on our Contact Us link on our website or via Company literature or via the Company's stated telephone, facsimile or mobile telephone numbers.

These terms and conditions form part of the Agreement between the Client and ourselves. Your accessing of this website and/or undertaking of a booking or Agreement indicates your understanding, agreement to and acceptance, of the Disclaimer Notice and the full Terms and Conditions contained herein. Your statutory Consumer Rights are unaffected.