## PRIVACY POLICY

At Hydrospas Ltd. we are committed to protecting and respecting your privacy.

This Privacy Policy discusses how your personal data will be collected and processed by us when you visit our showroom or website, make a purchase or enter prize competitions on our websites: <a href="www.hydrospas.co.uk">www.hydrospas.co.uk</a> or on our social media sites Facebook, YouTube, LinkedIn, X / Twitter and Instagram (together: "Websites"). By visiting our websites, you are accepting and agreeing to our Privacy Policy set out below.

In accordance with the data protection laws the data controller is Hydrospas Ltd. (registered in the United Kingdom, Company number 15478137) with its registered office held at 23-27 Brighton Road, Worthing, West Sussex BN11 3EF.

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#### 1. Personal data we may collect from you

We may collect and process data about you in the following ways:

When you visit our websites automatically, when you share your data with us and through third parties.

We may collect and process your data automatically ("automatic data collection") when you visit our websites. These include: search terms used to find our websites, technical information: like Internet protocol (IP) address used for your internet connection, browser type and version, your login information, time zone, browser plug-in types and versions, operating system and platform used, as well as cookies installed on your device. We also may collect information about your visit, including URL, what websites you have browsed and clicked to / from / through our websites, what products you have viewed /searched for, lengths of visits, and how you interact with our websites including your phone number if you called our customer service line through the websites.

We use the below technologies to may collect and process your data automatically:

- Cookies: data files on your device which may include anonymous unique identifier. We
  may use cookies to identify you from other users on our websites. For more information
  on cookies we use please see our Cookie Policy.
- Log Files: track actions on our websites and collects data including IP addresses, internet service providers, browser types, pages you have opened before during and after your visit to our websites, date / time / lengths of visits.
- We may also use Web beacons, Tags, and Pixels, which are electronic files used to record information about how you browse the site.

We collect and process your data you share with us ("personal data"): when you sign up for email correspondence or when you order through our websites / showroom or when you participate / enter an online promotion or competition, you will be given contact forms to fill in with your data included. Also, when you call us by phone we will keep data like what your enquiry was about and what is your contact number. Data collected this way may include your name, address, phone number, payment and bank account information.

Data received from other sources ("third parties"): we work continuously with third parties, including business partners; service companies in fulfilment; technical, payment and delivery services; online marketplaces; advertising, analytics and search information providers and we might receive information about you from them.

#### 2. How do we use your personal data?

We use your personal data we collect about you in the following ways:

- To communicate with you regarding customer service enquires placed by you
- To process and fulfil orders you have placed through our showroom / websites including processing payments, sending out order and shipping confirmations and invoices.
- To keep company records about services and goods provided
- According to your selected communication preference and with your consent (in accordance with data protection laws) we might be sending you personalised online marketing material to inform you about our ongoing offers and promotions relating to products you might be interested in.
- To send you a verification email at the time you have signed up with us
- We might send you emails in relation to account management or an ongoing system maintenance
- To build your account profile
- To get in touch with you regarding online prize competitions you have entered
- We might need your personal data to screen and stop fraud and abuse
- We may also keep information about how you use our services.
- We may ask you to provide physical evidence of identity verification as a lender will search the files of credit reference agencies which will keep a record of their search, whether or not your application for a loan proceeds. This is not seen by us or shared with any other 3rdparties unless written consent is received from you.

Please be advised that we will not use any payment (credit, debit card) information for any reason other than to fulfil our legal and regulatory duties and to process your payments for our products and services or funds due back to you in case of a refund.

We use our automatically collected data about you as follows:

- For the maintenance of our websites including: to optimise and improve our site, troubleshooting, data analysis, research, testing, to keep our site to be safe and secure, to measure success of our marketing /advertising campaigns, for statistical and survey purposes. E.g. Google Ads, Google Analytics, Facebook Advertising and Analytics, etc.
- Conducting appropriate and necessary investigations and fulfilling our legal and regulatory obligations, including compliance with anti-fraud and anti-money laundering requirements, and (where appropriate) protecting our personnel and other customers / users from unlawful, distracting or objectionable behaviour on our websites.

Personal data we receive from **third parties**: we might be using data received from third parties for the reasons set out above.

#### 3. Who do we share your personal data with and why?

We share your personal data with third parties to help us use your Personal Data, as described above. For example, we use Google Analytics to help us understand how our customers use the Site -- you can read more about how Google uses your Personal Information <u>HERE</u>. You can also opt-out of Google Analytics <u>HERE</u>.

We might use Trustpilot asking reviews from verified customers to improve our products and services --- you can read more about how Trustpilot uses your personal information <u>HERE</u>. You can opt-out from Trustpilot <u>HERE</u>.

We also have legal or regulatory requirements such as a request from the competition authority or law enforcement agency to share your personal data.

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# 4. Using your personal data in accordance with the Data Protection Laws

Data protection laws require that we comply with certain conditions before using your data as described in this Privacy Policy. We take our responsibilities under data protection law very seriously, including the fulfilment of these conditions. To use your personal data, we depend on the following terms and conditions, depending on the activity performed:

Compliance with legal obligations: As an entity established under the laws of the United Kingdom, Hydrospas Ltd. is obliged to comply with the Data Protection Act 1998 and the General Data Protection Regulation (EU) 2016/679 ("GDPR") on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). In particular, we need to process your personal data in order to verify your identity and sources of funds to prevent money laundering and fraud. You cannot object to processing or request the deletion of your personal data if we have reasons to believe you fall into this category.

Order fulfilment: We will need to collect and process your personal data, for you to be able to purchase our products through our websites. If you cannot provide all necessary personal and financial information for us to process your transaction or you for any reason object for us to process your personal data or request to exercise your rights to delete your personal data from our files – any of these actions will disable us to provide our products and services to you.

**Consent:** We may send you marketing messages by email, targeted ads and text message about us and our goods and services where you have subscribed or /and where you have bought goods from us. We provide easy ways to stop our marketing, and you can opt out at any time by emailing us at info@wellisuk.ltd.

#### 5. What rights do you have?

You have the following rights:

To be informed about how we use your personal data (the purpose of this Privacy Policy);

To update your personal data. You can update or amend your information by contacting us;

To ask us to delete your personal data. However, there may be circumstances where we are legally entitled to retain it;

To get a free copy of your personal data. A subset of your data (limited to data that you have provided to us) is available in a machine-readable format if required;

To object to the processing of your data and have it restricted. There may be circumstances where you ask us to restrict the processing of your information, but we are legally entitled to refuse that request;

You can object at any time to the use of your Personal Data for advertising or market research purposes. You may also withdraw your consent at any time. For this, simply send a short message by email to us to info@hydrospas.co.uk.

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#### 6. Are you aged 16 or under?

If you are aged 16 or under, you will need your parent or guardian's permission before you can provide your personal information to us by filling in our forms on our website. Without parental consent you cannot provide us with your personal information.

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#### 7. Changing your marketing preferences or opt-out

You can opt in and out of marketing communications at any time by contacting us. You will be able to choose to receive marketing communications about the services you have chosen. You can also opt out of marketing communications by following unsubscribe links at the end of any marketing emails received from Hydrospas Ltd. or by sending us an email to info@hydrospas.co.uk.or by calling us at 01903 255 490.

#### 8. How do we ensure your data is secure?

Hydrospas Ltd. is committed to keeping your data secure. We use a variety of security measures and procedures to help protect your personal data from unauthorized access, use or disclosure. All information you provide to us is stored on our secure servers or (in the case of payment information) those of our secure payment provider. Where you have chosen a password to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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#### 9. How we manage Special Category Data

In the unlikely event of us receiving Special Category Data as defined in the GDPR regulations set out by the Information Commissioners Office (ico.) Hydrospas Ltd. will inform you of the receipt of this information to discuss the deletion of this data.

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#### 10. What else you can do to ensure your data is secure?

Along with a section on Privacy, Get Safe Online has plenty of other good advice about protecting yourself online

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#### 11. Contact us

If you would like more information or would like to raise any queries with us in relation to your information, you can contact us via email, post or phone.

Hydrospas Ltd.

23-27 Brighton Road, Worthing, West Sussex, England, BN11 3EF.

Showroom Customer Support: 01903 255 490.

Email: info@hydrospas.co.uk

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### 12. Resolving Privacy Issues

We will always try our best to resolve any data privacy issue you may have. You have the right to refer any data privacy issue to the Information Commissioner's Office (ico.) at any time.

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This policy was last updated on the 3 June 2024.