# **Privacy Policy**

This website is operated by Aqua Global Solutions Limited ("Aqua")

We are committed to protecting your privacy and we comply with data protection laws applicable to the United Kingdom including the GDPR (General Data Protection Regulation)

This privacy policy applies to personal information about:

- Visitors to our website
- · Individuals who sign up or request further information on our products
- Our suppliers

## What is personal information?

Personal information is any information relating to an individual who can be identified directly or indirectly, often by name, account number, location, an online identifier or other factors specific to their identity.

Personal information may include "special category data" relating to racial or ethnic origin, political opinions, religious beliefs, membership of a trade union, physical or mental health and criminal records and allegations.

As a rule, we do not collect "special category data" about visitors to our website or individuals or suppliers.

See below for details of how we may use your personal information.

#### Website Visitors: The personal information we collect about you and how we use it

You can visit and browse our website without providing your name or contact details.

Like many websites, our server logs capture details of your operating system, browser software, IP (Internet Protocol) address and Uniform Resource Locator (URL), including the date and time of your visit.

We use cookies to analyse how our site is used by visitors and to provide some of the functionality – see our cookies policy: https://www.aqua-global-solutions.com/wp-content/uploads/2018/08/Aqua-Global-Solutions-Limited-Cookie-policy-2018-v1.2-2.pdf] for more information.

You may choose to provide your contact details (name, address, business, job title, email address, telephone number) through our contact page or by direct email or telephone.

#### Individuals: The personal information we collect about you and how we use it

As an organisation we provide products to businesses in the Banking and Financial sector. Most of the information we collect and retain is therefore in the context of business to business requests and transactions. It primarily consists of business contact details whether of the organisation itself or business contact details of individuals within such organisations ("business information"). As a business or individual within a business, you may request at any time to limit communications, opt out or have your details removed.

Information provided and collected whether personal information or business information may be used in the following ways:

- for marketing
- to respond to enquiries;
- to track activity on our site;
- · to notify you about new products, developments and important changes to our software
- for the provision of contracted development, maintenance and support services

- to notify you of upcoming changes in the Banking and Financial sector in so far as they relate to and are relevant to our products;
- to deal with enquiries and complaints;
- for record keeping purposes.

#### Suppliers: The personal information we collect about you and how we use it

If you supply products or services to us, we may use your personal information in the following ways:

- for order processing and management;
- to manage deliveries, installations, returns and refunds;
- for product liability purposes;
- to manage your account;
- to deal with enquiries and complaints;
- for claims management and insurance purposes; and
- for record keeping purposes.

If you are a supplier and you have any questions about how we use your personal information, please contact your usual business contact.

#### **Call Recording**

Some telephone calls may be recorded or monitored. Call recording and monitoring may be carried out for the following purposes:

- training and quality control;
- · as evidence of conversations; and/or
- provision of maintenance and support for our products and understanding issues

#### Legal Basis for Processing

Some of the information we collect is provided by you voluntarily (and therefore with your permission), for example when you request further information through our web site contact page.

The remainder of the information is collected for our legitimate business purposes, which include:

- For marketing
- To keep in touch with current, past and prospective customers
- To provide account management and related services
- To monitor the use of our website and improve its facilities
- To protect and defend our rights

#### Retention

We will retain your personal information for as long as needed for the legitimate business purposes described above.

If you request further information and we have no further contact, personal information will be deleted after 36 months.

If having provided information we enter into further communications, we may retain personal information beyond this period but only for as long as is reasonably necessary given the nature of our dealings.

Your information may be retained for longer than this if there are valid legal grounds for us to do so, for example if required by law or court order, or as needed to defend or pursue legal claims.

#### Transferring information to other countries

Some of the companies who provide services to us may be located outside the United Kingdom. For example, for certain projects we utilise IT Developers who are located in Poland. As a result, your personal information may be transferred outside the UK. We will ensure that those service providers comply with any legal requirements that apply to the transfer of personal information outside the UK, including, where appropriate, requiring the service provider to sign the approved European Commission Standard Contractual Clauses for the transfer of personal data to third countries.

#### Security

We are committed to safeguarding the personal information you provide to us. We use appropriate measures to protect the information that you submit through our website and the information we collect and store about our customers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of information you submit via our website and any transmission is at your own risk.

Once we have received your information, we will take appropriate technical and organisational measures to safeguard your personal data against loss, theft and unauthorised use, access or modification.

#### Changes to this policy

Any changes to this privacy policy will be posted on our website. Please refer back to this page regularly.

#### Links to other websites

Links may be provided on our website to other websites that are not operated by us. If you use these links, you will leave our website. You should note that we are not responsible for the contents of any third party website. External sites will have their own privacy policies which you should read carefully.

#### Your Rights

#### Opting out or limiting communications

If you prefer not to receive marketing or other information you can email or write to us per the contact details provided below.

#### Access and Correction

If you would like to correct or update any of your other personal information, or if you would like a copy of the personal information we hold, please contact the Aqua Data Information Officer using the contact details below. We may need to ask for proof of your identity before we can respond to your request.

## Other Rights

You may also have the following rights in relation to your personal information:

- in certain circumstances, the right to restrict or object to the processing of your personal information, or request that your personal information is deleted
- where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent
- in certain circumstances, the right to receive a copy of the personal information which you have provided to us, in a structured, commonly used and machine-readable format or to request that we transfer that information to another party (known as "data portability")
- the right to complain to a Data Protection Authority

## **Our Contact Details**

Please mark your communication "For the attention of the Aqua Data Controller"

#### By email: info@aqua-global-solutions.com

By Post: 84 Stafford Road, Surrey, Wallington, London, SM6 9AY