



REDEFINING ESSENTIAL PRODUCTS - FOR GOOD

ECONIC WEBSITE PRIVACY POLICY (GDPR VERSION)

Version- 1	Last update 18/11/18
Version- 1.1	Brand update 01/09/23

1. INTRODUCTION

Welcome to the Econic Technologies Ltd' s privacy notice.

Econic respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data, and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy on [our website](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

IMPORTANT INFORMATION AND WHO WE ARE
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HOW IS YOUR PERSONAL DATA COLLECTED?
HOW WE USE YOUR PERSONAL DATA
DISCLOSURES OF YOUR PERSONAL DATA
INTERNATIONAL TRANSFERS
DATA SECURITY
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GLOSSARY

1.1 IMPORTANT INFORMATION AND WHO WE ARE

Purpose Of This Privacy Notice

This privacy notice aims to give you information on how Econic collects and processes your personal data, including any data you may provide through this website when you sign up to our news feed, purchase a product or service or are a supplier.

This website is not intended for children and we do not knowingly collect data relating to children.

*Econic Technologies Ltd
Block 19S, Alderley Park
Macclesfield SK10 4TG
United Kingdom*

*Tel: +44 (0) 1625 238 645
econic-technologies.com
Twitter @EconicTech
Registered in England and Wales. Company No 07681400*

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It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Econic Technologies Ltd is the controller and responsible for your personal data (collectively referred to as “Econic” “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Econic Technologies Ltd
Name or title of the data privacy manager: Mrs L. Menhinick
Email address: l.menhinick@econic-technologies.com
Postal address: Block 19S Alderley Park – Macclesfield, Cheshire, SK10 4TG, UK

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 1st September 2023.

The data protection law in the UK will change on 25th May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) until May 2018 as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address,
- **Profile Data** includes your username and password, purchases or orders made by you, products supplied by you to us, your requirements, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services
- **Marketing and Communications Data** includes news updates and invitations you to conferences, talks and events Econic are taking part in

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. Econic's products and services are not intended for minors, we do not hold any information relating to children.

IF YOU FAIL TO PROVIDE PERSONAL DATA

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Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services or pay you for goods supplied to us). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for information about our products or services;
 - sign contracts, NDAs or other documents
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - send marketing and business information to us;
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
 - Technical Data from the following parties:
 - analytics providers such as Google based outside the EU;
 - conference and events organisers based inside **or** outside the EU of events Econic is organising, or taking part in; and
 - search information providers such as Google based inside **or** outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.



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- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email once you have opted in. You have the right to withdraw consent to marketing at any time by [Contacting us](#).

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Type of data	Purpose/Activity	Lawful basis for processing including basis of legitimate interest	How long the data is kept
CUSTOMERS			
(a) Identity (b) Contact details (c) Financial details (d) Transactional information (e) Marketing and Communications documents (f) Business requirements and product order history	To register you as a new customer To process and deliver your order including: <ul style="list-style-type: none"> • Managing payments, fees and charges • Collecting and recovering money owed to us To manage our business relationship with you which will include: <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Requesting confirmation of your details 	(a) Performance of a contract with you (b) Necessary for our legitimate business interests (c) Necessary to comply with a legal obligation	<ul style="list-style-type: none"> • Throughout the business relationship +12 years • Financial information is kept 12 years following the expiry of the last document.

	<ul style="list-style-type: none"> Updating you with company information, news and inviting you to event we take part in Keeping records of product batches, quality control and customer services follow ups 		
Contracts, NDA, MTA, all work, consultancy, secrecy, collaboration agreements	As part of due diligence, to manage our business relationship with you, and protect our business interests and Intellectual Property.	(a) Performance of a contract with you (b) Necessary for our legitimate business interests	Kept indefinitely
SUPPLIERS, CONSULTANTS AND PARTNERS			
Type of data	Purpose/Activity	Lawful basis for processing including basis of legitimate interest	How long the data is kept
(a) Identity (b) Contact details (c) Financial details (d) Transactional information (e) Marketing and Communications documents (f) Business requirements and product order history	<p>To register you on our system; To process and receive orders we have placed with you including:</p> <ul style="list-style-type: none"> Manage payments, fees and charges After sale services once we have bought a product or service from you <p>To manage our business relationship with you which will include:</p> <ul style="list-style-type: none"> Notifying you about changes to our terms or privacy policy Requesting confirmation of your details 	(a) Performance of a contract with you (b) Necessary for our legitimate business interests (c) Necessary to comply with a legal obligation	<ul style="list-style-type: none"> Throughout the business relationship +12 year and Financial information is kept internally for 12 years
Contracts, NDA, MTA, all work, consultancy,	As part of due diligence, to manage our business relationship with you, and	(a) Performance of a contract with you	<ul style="list-style-type: none"> Kept indefinitely



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secrecy, collaboration agreements	protect our business interests and Intellectual Property.	(b) Necessary for our legitimate business interests	
(a) Identity (b) Contact email (c) Technical information (d) website access	<ul style="list-style-type: none"> To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) To send you our newsletter and website news notification To use data analytics to improve our website, products/services, marketing, and customer relationships 	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	<ul style="list-style-type: none"> Throughout the business relationship and contract requirements Consent for emailed newsletter expires 2 years from granting, at which point confirmation will be sought again

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and company news may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us by filling our online form or purchased products or services from us and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

Your data will not be shared, sold or otherwise distributed to any third-party organisation for marketing purposes.



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However we might use third parties to hold the database of such information (in the case of website forms for instance or social media links)

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [Contacting us](#).at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

COOKIES

The Econic website does not use cookies.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Specific third parties [listed in the table in *the Glossary*
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.



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We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

Please see section 4.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for up to seven years after they cease being customers for tax and accounting purposes.]

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

1. The right to be informed
2. The right of access
3. The right to rectification

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4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Information on these rights is detailed on the [ICO website](#).

If you wish to exercise any of the rights set out above, please [email us](#) or write to the Office Manager to the address stated in section 1.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your



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personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

THIRD PARTIES

INTERNAL THIRD PARTIES

Our funders are third party organisations linked with Econic Technologies, they have a working knowledge of Econic's data under due diligence process; they are based in the United Kingdom, the United States of America, and Belgium. However they do not have direct access to your data nor do they process it.

EXTERNAL THIRD PARTIES

- Service providers acting as processors based in Europe who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.
- IT companies helping us maintain our network, supporting our IT system and building our website, have access to the data gathered online and on our secure server; their access is tightly controlled and all are under strict NDAs.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to



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processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.