

Online Privacy Notice

Introduction

This privacy notice applies to personal data we process when you interact with us or visit our website. Further privacy notice statements and documents may apply offline and these are available, if relevant, on request.

We are committed to protecting your personal data privacy and, in accordance with relevant data protection laws, we uphold strict security procedures for the collection, storage, use and disclosure of your personal information. We are committed to protecting and respecting your privacy in all interactions with our company. This privacy notice outlines the personal information we may collect from you before, during, or after your engagement with us and how we use and safeguard your information.

We have described below the personal information we may gather about you, the purposes we will hold it for and the limited categories of people to whom we may disclose it.

1. Who are we?

- 1.1. This site is owned by Shared Access Ltd whose office is at Navigation House, The Shipyard, Bath Road, Lymington, Hampshire SO41 3YJ.
- 1.2. Our Company registration number is 06345316. We are the 'data controller' of the personal information you provide to us.
- 1.3. We are registered as a data controller with the Information Commissioners Office and our registration number is: **ZB 048518**
- 1.4. We have appointed a Data Contact for the business, and you can contact our Data Contact by post using the above address or via email at gdpr@sharedaccess.com if you have any queries regarding this privacy notice.
- 1.5. As a data controller, we will take all the necessary steps to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) and the Data Use and Access Act 2025 (DUAA) or any other relevant legislation when handling any personal data which you may provide to us.
- 1.6. We are responsible for ensuring that data is:
 - a Fairly and lawfully processed
 - b Processed for limited purposes
 - c Adequate, relevant and not excessive
 - d Accurate and Secure
 - e Not kept longer than necessary
 - f Processed in accordance with your rights
 - g Not transferred to countries outside the UK without safeguards
 - h Processed in a manner that ensures appropriate security of personal data

2. Lawful basis for processing your information

- 2.1 Privacy laws require us to have a valid reason for using your personal data. We take this responsibility seriously and ensure that we meet the necessary requirements. Depending on the situation, we may rely on the following reasons to process your

information:

- a To fulfill our contract with you and provide our services
- b To comply with legal obligations
- c For our legitimate interests (as explained below)
- d To protect your vital interests
- e With your consent
- f To establish, exercise, or defend legal claims
- g For reasons of substantial public interest

3. What information do we collect and how may we use it?

- 3.1 In all interactions with our company, we will only collect personal information that you choose to provide. This includes, for example, when you contact us with an enquiry or request further information, or engage with us through our website, customer service, or any other communication channels.
- 3.2 If you share other people's data with us or if you refer business to us on behalf of another individual, you will need to check you have lawful authority to do so. For example, the other party has given their consent to you providing us with their information. In such a case you are responsible for ensuring the transmission to us of the information is lawful and we may ask you for documentary evidence of this.
- 3.3 The other types of data we may collect from you may include the following:
 - a **Identity data:** name, username, title, date of birth.
 - b **Contact data:** billing and delivery address, email address, phone number.
 - c **Financial data:** payment card details (processed by a third-party payment services provider and not stored by us).
 - d **Transaction data:** details of products purchased, amounts, dates etc.
 - e **Technical data:** IP address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform.
 - f **Profile data:** username and password, purchases or orders made by users.
 - g **Usage data:** information about how users use our website, products and services.
 - h **Marketing and communications data:** record of website users' preferences in receiving marketing from us about the products we sell.
- 3.4 We may use the information you provide us with in the following ways:
 - a To administer any account, you have with us.
 - b To fulfil our contractual obligations to you.
 - c To respond to your queries and requests.
 - d To communicate with you.
 - e To ensure that the content of our site is presented in the most effective manner.
 - f To provide you with any information, products and/or services requested from us.
 - g To provide you with helpful information about our products or services.
 - h To make improvements to the service we provide you.
 - i We also reserve the right to disclose your personal information where we are required to do so by law, such as to assist in any disputes, claims or investigations relating to your account or contracts with us and to detect and prevent fraudulent transactions.
 - j E-mail correspondence with us via our website and email addresses accessible through or obtained from this site may be recorded and/or monitored.

4. Use of Third-Party Video Conferencing Applications

- 4.1 Where we engage with you online using a video conferencing application the lawful basis will be our Legitimate Interests and the following will apply:
- a All participants in video conferencing will be given specific log in detail.
 - b We operate in accordance with our Video Conferencing Guidelines.
 - c As a data controller we will manage the personal data shared by participants and restrict or control access as necessary for the security of other participants and to prevent cyber security issues such as Phishing.
 - d Password access will be controlled by the moderator and individual passwords issued where an increased risk is perceived such as large groups or public access.
- 4.2 A Legitimate Interest Assessment (LIA) on video conferencing was conducted which concluded the use of video conferencing was in our legitimate interests:
- a To facilitate efficient business video and telecommunications.
 - b To protect the safety of our employees and participants on the call from unnecessary real world travelling.
 - c To support our primary business objectives.

5. How do we store and protect your data?

- 5.1 We have robust information security management systems in place to protect your personal data. We take the security of your information seriously and have implemented appropriate technical and organisational security measures to protect your data against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage.
- 5.2 Data we receive and process is held by us in secure electronic devices and separate back up devices and servers.
- 5.3 Personal data may also be held in encrypted 3rd party 'Cloud' Servers.
- 5.4 Further encrypted backups of data may be held securely in offsite locations which are also subject to physical security at their location.
- 5.5 We will not sell, rent or otherwise disclose the personal information you provide to us through the site to third parties (other than as listed below) unless we are required to do so by law.
- 5.6 The Main Establishment for all of our data processing is the UK.
- 5.7 Due to the operation of the internet and other computer-based applications, personal data under our control may transit countries outside of the UK.
- 5.8 We will only transfer data outside the UK if adequate safeguards are in place in the destination country.
- 5.9 Where personal data is transferred to a third country or an international organisation, we will ensure that an adequacy decision or a similar legal mechanism is in place between the UK and the relevant country or region. Where no adequacy decision

exists, and we rely on the provisions of Standard Contractual Clauses or Binding Corporate Rules, evidence of the safeguards provided will be available upon request.

- 5.10 We may share your personal information with certain third parties who provide services on our behalf.
- 5.11 Such third parties will only have access to the personal information they need to perform those services.
- 5.12 Such third parties are bound by contractual arrangements with us in accordance with data protection legislation and are required to keep your personal information secure and confidential. They may only use it as permitted by us in accordance with our contractual agreement.
- 5.13 If you have contracted with us, we will share data only to the extent necessary for the performance of the contract, otherwise we will obtain specific additional consent from you before sharing your data.
- 5.14 The third parties who provide services on our behalf fall into the following categories:
 - a Our partners who provide logistics and external service support.
 - b Our business partners or advisors for the purpose of completing a contract with you.
 - c Marketing agencies who have been appointed to provide services for us.
 - d The service providers who operate this site on our behalf.
 - e Accountants, auditors, law firms, payment processors and information technology support providers.
 - f Advertising services, analytics services, computer application and software providers.

6. How long do we store your data?

- 6.1 We will not keep your data for longer than is necessary for the relevant purposes set out in this privacy notice.
- 6.2 Where you have purchased a product or service from us, we will hold your relevant personal details to enable us to administer the contract and provide such after-sales services as may be required.
- 6.3 With any speculative enquiries for information, the data will be retained for 12 months in case of a follow up enquiry, unless the consent is rescinded.
- 6.4 We also store personal data in line with regulatory and legal requirements in accordance with the law.

7. Your Rights

Under the UK GDPR, DPA and DUAA you have several rights with regard to your personal data. To exercise any of your rights, contact our Data Contact using the details given above.

- 7.1 You have the right:
 - a **to request access** - You have the right to request a copy of the personal data we hold about you.

- b **to rectification** - If any of your personal data is inaccurate or incomplete, you can request a correction.
- c **to erase your personal data** - You can ask us to delete your personal data when it is no longer necessary for the purpose it was collected.
- d **to restrict processing** - You have the right to request that we limit the processing of your data under certain circumstances.
- e **to object to processing** - You can object to the processing of your personal data if you believe it impacts your rights and freedoms.
- f **to data portability**. Following a request relating to data portability we will transmit the relevant personal data to the data subject or their nominated data controller where it is possible and technically feasible for us to do so.
- g **to request human intervention** - If a decision has been derived from the use of a computer program or software.
- h **to consent or withdraw your consent** - For the processing of your personal data, at any time, where you have provided your data voluntarily.
- i **to lodge a complaint** - With the relevant data protection authority if you believe your data protection rights have been violated. You can contact the Information Commissioners' Office on **0303 123 1113** or through their website www.ico.org.uk.

- 7.2 Where we need to process data for the purposes of entering into a contract with you, if you fail to provide such data it may mean that we cannot establish legal relations between us and the contract may not be able to go ahead. We will inform you if this happens.
- 7.3 It is important to note that we will retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If we need to use your data for a reason it was not collected and you are not aware of this, we will inform you and in appropriate cases obtain your further consent to such use.
- 7.4 If we process data about you but we have not obtained the data personally from you, we must provide you with the information described in this privacy notice and some additional information.
- 7.5 The additional information will be provided to you at least by the time we contact you and at any event within the space of one month after we obtain it.
- 7.6 If the processing is based on Legitimate Interests, you are entitled to know what and whose Legitimate Interests they are.
- 7.7 You are entitled to know the purpose of the processing, whether we or someone else is processing it and the categories of personal data involved.
- 7.8 You are entitled to know the source of the information and whether the source is publicly accessible.
- 7.9 There are some exceptions to this additional information rule. If we obtain your personal data from a source other than yourself, the additional information rules will apply, unless:
 - a You already have the information regarding our processing; or

- b it would take a disproportionate effort or be impossible to provide you with it; or
- c you are already legally protected under separate provisions; or
- d we have a legal duty not to disclose it.

7.10 We use the lawful basis of Legitimate Interests for processing data in the following circumstances:

- a When processing data from our CCTV equipment.
- b When processing data using video conferencing software.
- c When processing data using medical temperature taking equipment

8. Lawful bases for data processing

- 8.1 We hold and process your data through legally permitted means, including:
- a **Your Consent:** Consent is usually given by yourself when you contact us or personally when we discuss products or advice with you.
 - b **Contractual obligations:** This occurs when you purchase products or services from us.
 - c **Legal Obligation:** When the processing is necessary for us to comply with the Law.
 - d **Vital Interests:** When the processing is necessary to protect someone's life.
 - e **Public Task:** When the processing is necessary for us to perform a task in the public interest or for an official function and the task or function has a clear basis in Law.
 - f **Legitimate Interests:** When the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. All of our Legitimate Interests Assessment Tests have been documented, recorded and retained.

9. Children's data

- 9.1 Our site is not directed at children and should not be accessed by them.
- 9.2 We will not knowingly collect information from persons under 13 years of age without their parent or guardian's consent.
- 9.3 If a parent or guardian of a person under 13 years of age discovers their child has engaged with our services without their consent, please email us immediately using gdpr@sharedaccess.com.
- 9.4 We have considered the elements of the AADC (Children's code) in relation to our online activity and concluded that we are not a relevant Information Society Service which is likely to be accessed by children.
- 9.5 Our website and our products are only available and relevant to adults over the age of 18 years.

10. Third Party Websites

- 10.1 From time to time our site may contain links to and from the websites of our suppliers or other third-party sites.
- 10.2 If you visit any of these sites you should confirm they have their own privacy notices and you should check these before submitting any personal data on their site. We

cannot accept any responsibility or liability for the notices on third party websites.

13. Business Transfer or Sale

- 13.1 In the event our business, or part of it, is taken over, bought or merged with another business we may need to disclose any personal data we are holding about you to the other company so they can continue to provide services to you in accordance with this privacy notice.
- 13.2 It may be necessary to transfer your data to a company that is negotiating with us for the purchase of our business but only where it is necessary to evaluate the business purchase transaction.
- 13.3 In the case of a pre-sale transfer of personal data, the data would be kept safe during the negotiations and destroyed by the third party if the sale or merger did not go ahead.

14. Updating your information

- 14.1 If there is a change to your personal information, for example your contact details, please let us know of this by writing to the Data Contact using the contact details provided above so we can keep your information up to date and accurate.

15. Contacting us

- 15.1 If you have any comments or queries about this privacy notice or you wish to exercise any of your rights please write to us at Shared Access Ltd, Navigation House, The Shipyard, Bath Road, Lymington, Hampshire, SO41 3YJ. Alternatively, you can contact us via email at gdpr@sharedaccess.com.

16. Changes to this privacy notice

- 16.1 There may be developments in how we use your data according to changes in the law.
- 16.2 We reserve the right to make changes to this privacy notice at any time without notice and it is your responsibility to revisit this page from time to time to re-read this policy including any and each time you visit our website.
- 16.3 Any revised terms shall take effect as at the date of posting.
- 16.4 If you don't find your concern addressed here, feel free to contact us by e-mailing our Data Contact at the contact details given above.