

## GDPR & Privacy Statement from ecoSUB Robotics Ltd

We want to stay connected with you to ensure that you do not miss out on what we are doing. We have conducted an internal audit to ensure that we are compliant in all areas of GDPR. **Specifically for our marketing newsletter and other marketing activities, we provide the following statement.**

### Privacy statement overview for marketing activities:

- ecoSUB Robotics Ltd maintain a record of your name, address, telephone number(s), affiliation, web & email address and areas of interest. We do not store any financial or other personal information
- Your information has been gathered by us directly, as a result of your direct contact with us by positive subscription, email, letter, visit or providing us with information at an exhibition or event
- Your data are mostly stored electronically, but also as hard copy in the form of business cards and enquiry sheets collected at exhibitions and other events.
- Your data are held to allow us to keep you informed about activities and technology software updates and events available from ecoSUB Robotics Ltd and our partners
- Your information is only available to the ecoSUB Robotics Sales and Marketing team.
- Your information is not shared with or sold to third parties
- Your information is stored by us using Salesforce CRM held in a secure data base. Their privacy statement can be found here:- [https://www.salesforce.com/uk/company/privacy/full\\_privacy/](https://www.salesforce.com/uk/company/privacy/full_privacy/) Specifically for your data see sections 10 and 11. For the purposes of European Directive 95/46/EC and applicable national implementing laws in our jurisdiction, with respect to our data, they are a data controller and with respect to your information, they are a data processor
- You can withdraw your permission to receive our emails at any time by using the unsubscribe link found at the bottom of every newsletter you receive from us.
- Our newsletters are sent via constant contact. Their privacy statement can be viewed here:- <https://www.constantcontact.com/legal/privacy-statement> For the purposes of European Directive 95/46/EC and applicable national implementing laws in our jurisdiction, with respect to our data, they are a data controller and with respect to your information, they are a data processor
- You can request a copy of your information that we store, by contacting [sales@ecoSUB.uk](mailto:sales@ecoSUB.uk)

## **Detailed Privacy Policy:**

### **This policy additionally covers our interactions with customers and suppliers.**

ecoSUB Robotics Ltd. (“we”, “us” or “our” in this privacy policy) are committed to protecting and respecting your privacy.

This policy and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand how we will look after your personal data when you visit our website, and interact with us, and to tell you about your privacy rights and how the law protects you. Please note, that this document covers PERSONAL DATA ONLY relating to an individual.

This privacy notice aims to give you information on how we collect and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, enquire about a product or service or take part in a competition. This privacy notice also applies when you provide data to us in person or via other means such as email.

This privacy notice does not apply to the processing of data relating to our recruitment or our employees. The processing of such data is governed by privacy statements applicable to those purposes, please read these privacy statements if they are relevant to you.

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

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.

### **CONTACTING US**

For the purpose of the General Data Protection Regulation (GDPR) the **DATA CONTROLLER** is ecoSUB Robotics Ltd.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data compliance manager using the details set out below.

#### **The Managing Director**

ecoSUB Robotics Ltd  
Unit 16 Camberley Business Centre  
Bracebridge  
Camberley  
GU15 3DP

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](http://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.

## YOUR DUTY TO INFORM US OF 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.

Our site may, from time to time, contain links to and from the websites of our partner networks, third party representatives and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## INFORMATION WE MAY COLLECT FROM 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) or information relating to companies or other similar entities.

We **may** collect, use, store and transfer the following data about you:

Identity Data - includes first name, last name, username or similar identifier,

Contact Data - includes billing address, delivery address, email address and telephone numbers, for customers and suppliers

Financial Data - includes bank account and payment card details for customers and suppliers

Transaction Data - includes details about payments to and from you and other details of products and services you have purchased from us or we from you. These data are not gathered via this web site

Technical Data - includes internet protocol (IP) address, browser type and version, time zone setting and location, browser versions, operating system and platform and other technology on the devices you use to access this website

Profile Data - includes your purchases or orders made by you, your interests, preferences, feedback and survey responses

Usage Data - includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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, 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.

## **IF YOU DO NOT PROVIDE PERSONAL DATA**

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). 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.

## **HOW WE COLLECT YOUR PERSONAL DATA**

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 our products or services;
- interact on our website;
- subscribe to our service or publications;
- request marketing material to be sent to you;
- enter a competition, promotion or survey; or if you provide us with feedback.

**Automated technologies or interactions** - As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

**Third parties or publicly available sources** - We may receive personal data about you from various third parties and public sources as set out below:

- Analytics providers such as Google, LinkedIn, Twitter, YouTube, Facebook based outside the EU;
- Advertising networks such as Google, LinkedIn, Twitter based outside the EU; and Search information providers such as Google, LinkedIn, based outside the EU.
- Identity and Contact Data for due diligence and credit checks from data service providers such as Experian and Dun & Bradstreet based inside and outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House based inside the EU.

## **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.
- 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.
- If you have not retracted your consent for us to send you marketing materials.

## LAWFUL BASIS

The following are the types of lawful basis that we will rely on to process your personal data.

**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 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**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.

**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.

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 or text message. You have the right to withdraw consent to marketing at any time by contacting us. Where we do need to rely on consent we will provide a privacy notice that directly relates to the specific processing under consideration as part our request to process your personal data.

## 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer/supplier/third party representative and keep your contact data up to date	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver/receive the order including: (a) Manage payments, deliveries fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## MARKETING

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

### PROMOTIONAL OFFERS FROM US

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 offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### OPTING OUT

You can ask us 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**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

## **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.

## **DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

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

- **INTERNAL THIRD PARTIES** – Companies in the EcoSUB Robotics Group and who provide system administration services and reporting.
- **EXTERNAL THIRD PARTIES** - Service providers acting as processors based in U.S., who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom, who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom, for EcoSUB Robotics Ltd. who require reporting of processing activities in certain circumstances.
- 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.

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.

## **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”) (SAGE Accounting Salesforce CRM and Constant Contact email processor). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you 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.

## **DATA SECURITY**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

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.



## DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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

In some circumstances you can ask us to delete your data: see Request erasure below under 'Your Legal Rights' for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### YOUR LEGAL RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right at any time to prevent such processing by contacting us.

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

#### **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 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.

If you wish to exercise any of the rights set out above, please contact us.

#### **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### **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.

Thank you for connecting with EcoSUB Robotics Ltd.