



EGO TECHNOLOGY LTD

DATA PRIVACY POLICY

2023-2024 V2

T: 01283 890990
W: www.egotechnology.co.uk

DATA PRIVACY POLICY

Welcome and thank you for your interest in EGO Technology Ltd (“EGO”, “we,” or “us”), our web site at <https://www.egotechnology.co.uk> (the “Site”), all related web sites, and other services provided by us and on which a link to this Privacy Policy is displayed, and all other communications with individuals though from written or oral means, such as email or phone (collectively, together with the Site, our “Service”).

This Privacy Policy (“Policy”) describes the information that we gather on or through the Service, how we use and disclose such information, and the steps we take to protect such information. By visiting the Site, or by purchasing or using our Service, you accept the privacy practices described in this Policy.

DEFINITIONS

“Customer” means a customer of EGO technology.

“Customer Data” means personal data, reports, addresses, and other files in electronic form that a Customer of our Site stores within our website.

“Personal Data” means any information relating to an identified or identifiable natural person.

“Public Area” means the area of the Site that can be accessed both by Customers and Visitors, without needing to log in.

“Restricted Area” means the area of the Site that can be accessed only by Customers, and where access requires logging in such as the Genesis Portal.

“Customer” means an employee, agent, or representative of a Customer, who primarily uses the restricted areas of the.

“Visitor” means an individual other than a Customer, who uses the public area, but has no access to the restricted areas of the Site.

2. THE INFORMATION WE COLLECT ON THE SITE:

We collect different types of information from or through the Site. The legal bases for EGO’s processing of personal data are primarily that the processing is necessary for providing our service and that the processing is carried out in EGO’s legitimate interests, which are further explained in the section “How We Use the Information We Collect” of this Policy. We may also process data upon your consent, asking for it as appropriate.

2.1 CUSTOMER-PROVIDED INFORMATION.

We collect different types of information from or through the Site. The legal bases for EGO’s processing of personal data are primarily that the processing is necessary for providing our service and that the processing is carried out in EGO’s legitimate interests, which are further explained in the section “How We Use the Information We Collect” of this Policy. We may also process data upon your consent, asking for it as appropriate.

When you use the Site, as a Customer or as a Visitor, you may provide, and we may collect Personal Data. Examples of Personal Data include name, email address, mailing address, mobile phone number, and credit card or other billing information. Personal Data also includes other information, such as geographic area or preferences, when any such information is linked to information that identifies a specific individual. You may provide us with Personal Data in various ways on the Service. For example, when you register for an Account, use the Site, or send us customer service-related requests.

2.2 "AUTOMATICALLY COLLECTED" INFORMATION.

When a Customer or Visitor uses the Site, we may automatically record certain information from the Customer's or Visitor's device by using various types of technology, including cookies, "clear gifs" or "web beacons." This "automatically collected" information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Service, the pages or other content the Customer or Visitor views or interacts with on the Site, and the dates and times of the visit, access, or use of the Site. We also may use these technologies to collect information regarding a Visitor or Customer's interaction with email messages, such as whether the Visitor or Customer opens, clicks on, or forwards a message. This information is gathered from all Customers and Visitors.

2.3 INTEGRATED SERVICES.

You may be given the option to access or register for the Site through the use of your Customer name and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your Google account, or otherwise have the option to authorise an Integrated Service to provide Personal Data or other information to us. By authorising us to connect with an Integrated Service, you authorise us to access and store your name, email address(es), date of birth, gender, current city, profile picture URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Site.

2.4 INFORMATION FROM OTHER SOURCES.

We may obtain information, including Personal Data, from third parties and sources other than the Site, such as our partners, advertisers, credit rating agencies, and Integrated Services. If we combine or associate information from other sources with Personal Data that we collect through the Service, we will treat the combined information as Personal Data in accordance with this Policy.

3. HOW WE USE THE INFORMATION WE COLLECT

We use the information that we collect in a variety of ways in providing our service and operating our business, including the following:

3.1 OPERATIONS

We use the information – other than Customer Data – to operate, maintain, enhance and provide all features of the Site, to provide the services and information that you request, to respond to comments and questions and to provide support to Customers of our Site. We process Customer Data solely in accordance with the directions provided by the applicable Customer or Customer.

3.2 IMPROVEMENTS

We use the information to understand and analyse the usage trends and preferences of our

Visitors and Customers, to improve the Site, and to develop new products, services, feature, and functionality. Should this purpose require EGO to process Customer Data, then the data will only be used in anonymised or aggregated form.

3 COMMUNICATIONS

We may use a Visitor's or Customer's email address or other information, other than Customer Data to contact that Visitor or Customer (i) for administrative purposes such as customer service or (ii) with updates on promotions, relating to products and services offered by us and by third parties we work with. You have the ability to opt-out of receiving any promotional communications as described below under "Your Choices."

3.4 COOKIES AND TRACKING TECHNOLOGIES

We use automatically collected information and other information collected on the Site through cookies and similar technologies to: (i) personalise our service, such as remembering a Customer's or Visitor's information so that the Customer or Visitor will not have to re-enter it during a visit or on subsequent visits; (ii) provide customised advertisements, content, and information; (iii) monitor and analyse the effectiveness of our Site and third-party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track your entries, submissions, and status in any promotions or other activities on the Site. You can obtain more information about cookies by visiting <http://www.allaboutcookies.org>.

3.5 ANALYTICS

We use Google Analytics to measure and evaluate access to and traffic on the Public Area of the Site and create Customer navigation reports for our Site administrators. Google operates independently from us and has its own privacy policy, which we strongly suggest you review. Google may use the information collected through Google Analytics to evaluate Customers' and Visitors' activity on our Site. For more information, see Google Analytics Privacy and Data Sharing.

We take measures to protect the technical information collected by our use of Google Analytics. The data collected will only be used on a need to know basis to resolve technical issues, administer the Site and identify visitor preferences; but in this case, the data will be in non-identifiable form. We do not use any of this information to identify Visitors or Customers.

4. TO WHOM WE DISCLOSE INFORMATION

Except as described in this Policy, we will not intentionally disclose the Personal Data or Customer Data that we collect or store on the Service to third parties without the consent of the applicable Visitor or Customer. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

4.1 UNRESTRICTED INFORMATION

Any information that you voluntarily choose to include in a Public Area of the Site will be available to any Visitor or Customer who has access to that content.

4.2 SERVICE PROVIDERS

We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Data or Customer Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

4.3 NON PERSONALLY IDENTIFIABLE INFORMATION

We may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our Customers', Customers' and Visitors' interests, habits, and usage patterns for certain programs, content, services, and/or functionality available through the Service.

4.4 LAW ENFORCEMENT, LEGAL PROCESS AND COMPLIANCE

We may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a facially valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.

We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Site and any facilities or equipment used to make the Site available, or (v) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.

4.5 CHANGE OF OWNERSHIP

Information about Customers and Visitors, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the Customer or Visitor Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

Customer Data may be physically or electronically transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, for the sole purpose of continuing the operation of the Site, and only if the recipient of the Customer Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

5. YOUR CHOICES

5.1 ACCESS, CORRECTION, DELETION

We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Site. If you wish to access or amend any other Personal Data we hold about you, or to request that we delete or transfer any information about you that we have obtained from an Integrated Service, you may contact us at compliance@egotechnology.co.uk. At your request, EGO will send you a Right to Erasure Request where you will have the right to request to be deleted or blocked in our database.

You may update, correct, or delete your Account information and preferences at any time by accessing your Account portal settings page on the Site. Please note that while any changes you make will be reflected in active Customer databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some of the features and functionality of our service. At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact compliance@egotechnology.co.uk. You also have a right to lodge a complaint with data protection authorities.

5.2 NAVIGATION INFORMATION

You may opt out from the collection of navigation information about your visit to the Site by Google Analytics by using the Google Analytics Opt-out feature.

5.3 OPTING OUT FROM COMMERCIAL COMMUNICATIONS

If you receive commercial emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to Unsubscribe. Please be aware that if you opt-out of receiving commercial email from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten (10) business days for us to process your request. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Site.

6. THIRD-PARTY SERVICES

The Site may contain features or links to web sites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy, and security, even if accessed through the Site. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

8. INTEREST BASED ADVERTISING

Interest based advertising is the collection of data from different sources and across different platforms in order to predict an individual's preferences or interest and to deliver to that individual, or his/her computer, smart phone or tablet, advertising based on his/her assumed preference or interest inferred from the collection of data pertaining to that individual or others who may have a similar profile or similar interests.

We work with a variety of third parties to attempt to understand the profiles of the individuals who are most likely to be interested in the EGO products or services so that we can send them promotional emails or serve our advertisements to them on the websites and mobile apps of other entities.

These third parties include: (a) advertising networks, which collect information about a person's interests when that person views or interacts with one of their advertisements; (2) attribution partners, which measure the effectiveness of certain advertisements; and (3) business partners, which collect information when a person views or interacts with one of their advertisements. In collaboration with these third parties, we collect information about our customers, prospects, and other individuals over time and across different platforms when they use these platforms or interact with them. Individuals may submit information directly on our Sites or on platforms run by third parties, or by interacting with us, our advertisements, or emails they receive from us or from third parties. We may use special tools that are commonly used for this purpose, such as cookies, beacons, pixels, tags, mobile advertising IDs, flash cookies, and similar technologies. We may have access to databases of information collected by our business partners.

The information we or third party collect enables us to learn what purchases the person made, what ads or content the person sees, on which ads or links the person clicks, and other actions that the person takes on our Sites, or in response to our emails, or when visiting or using third parties' platforms.

We, or the third parties with which we work, use the information collected as described above to understand the various activities and behaviours of our customers, Site visitors and others. We, or these third parties, do this for many reasons, including: to recognise new or past visitors to our Sites; to present more personalised content; to provide more useful and relevant ads – for example, if we know what ads you are shown we can try not to show you the same ones repeatedly; to identify visitors across devices, sales channels, third party websites and Sites, or to display or send personalised or targeted ads and other custom content that is more focused on a person's perceived interest in products or services similar to those that we offer.

Our interest-based ads may be served to you in emails or on third-party platforms. We may serve these ads about our products or services or send commercial communications directly ourselves or through these third parties.

Visitors may opt out of receiving interest based advertising by advertising networks that may be delivered to them on our platform and other websites by visiting the following websites: <http://www.aboutads.info/consumers>; <https://thenai.org> These features will opt a Visitor out of many – but not all – of the interest-based advertising activities in which we or third parties engage.

9. DATA SECURITY

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Site, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the "Contact Us" section. If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

10. DATA RETENTION

We only retain the Personal Data collected from a Customer for as long as the Customer's account is active or otherwise for a limited period of time as long as we need it to fulfil the purposes for which we have initially collected it, unless otherwise required by law. We will retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

11. SETTINGS

Although we may allow you to adjust your privacy settings to limit access to certain Personal Data, please be aware that no security measures are perfect or impenetrable. We are not responsible for circumvention of any privacy settings or security measures on the Site. Additionally, we cannot control the

actions of other Customers with whom you may choose to share your information. Further, even after information posted on the Site is removed, caching, and archiving services may have saved that information, and other Customers or third parties may have copied or stored the information available on the Site. We cannot and do not guarantee that information you post on or transmit to the Site will not be viewed by unauthorised persons.

12. DATA TRANSFER

We may transfer, process and store Personal Data we collect through the Site in centralised databases and with service providers located in the U.S. The U.S. may not have the same data protection framework as the country from which you may be using the Services. When we transfer Personal Data to the U.S, we will protect it as described in this Privacy Policy.

We will comply with GDPR requirements providing adequate protection for the transfer of personal information from Europe to the U.S. Also, we may transfer your data to the U.S, the EEA, or other countries or regions deemed by the European Commission to provide adequate protection of personal data in connection with storage and processing of data, fulfilling your requests, and operating the Service.

13. CHANGES AND UPDATES TO THIS POLICY

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. Your continued use of the Site after the revised Policy has become effective indicates that you have read, understood, and agreed to the current version of the Policy.

14. HOW TO CONTACT US

Please contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by email at compliance@egotechnology.co.uk.