AD Supply Group Limited
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PRIVACY POLICY

The privacy of our website users is important to us, and we are committed to safeguarding it diligently. This policy serves to elucidate the way we utilize any personal information we may gather from you.

Personal Information

For the purposes of this statement, personal information refers to any information about a specific individual or any data that identifies or could potentially identify a specific individual. In simpler terms, it encompasses any piece of information that can be linked back to you.

This information may include data collected directly from you, automatically gathered, or received from third parties. Whenever we collect Personal Information, we will furnish a Privacy Notice detailing the specifics of what Personal Information we gather, its intended use, and the legal basis underpinning its utilization.

Collecting your personal information

We employ various methods to collect data from and about you, which include:

- 1. Direct interactions: You may provide us with your personal information through direct interactions such as filling in forms or corresponding with us via post, phone, email, or other means. This could involve:
 - Applying for our products or services
 - Creating an account on our website
 - Subscribing to our service or publications
 - Requesting marketing materials
 - Participating in a competition, promotion, or survey
 - Providing feedback
 - Sharing your details at an exhibition or event

- 2. Automatic collection: Information collected automatically may include details such as your IP address, device type, unique device identification numbers, browser type, general geographic location (e.g., country or city-level location), and other technical data. Additionally, we may gather information on how your device interacts with our websites, including pages accessed and links clicked. Some of this data may be obtained using cookies and similar tracking technologies, as elaborated further under the section "Cookies and similar tracking technology."
- 3. Third-party sources: Periodically, we may receive personal information about you from third-party sources, including companies that facilitate our competitions or provide services to us. However, we ensure that these third parties have either obtained your consent or are legally authorized or obligated to disclose your personal information to us.

Failing to give us your personal information.

If there is a legal obligation or contractual agreement requiring us to collect personal information from you, and you fail to provide the requested information upon our request, we may be unable to fulfil the contract we have with you or are attempting to establish. For instance, this could involve our inability to provide you with our products and services. In such circumstances, we reserve the right to cancel any product or service you have with us. However, we will promptly notify you if this action becomes necessary at the time.

Changing why we use your personal information.

We will strictly adhere to this principle. Our commitment is to solely utilize your personal information for the purposes for which it was originally collected. However, there may be circumstances where we reasonably determine the necessity to employ it for another compatible reason, or where legal obligations dictate otherwise.

Sharing your personal information

We do not typically disclose your Personal Information to third parties unless:

- **Legal Obligations**: We are compelled to do so by law or by another regulatory body, or when we deem it necessary for legal or safety reasons.
- AD Suppply Group Entities: It involves sharing with other entities within the AD Supply Group.
- **Service Providers:** It pertains to suppliers who render processing services to us under contract, ensuring compliance with relevant laws.

- **Professional Advisers:** This includes lawyers, bankers, auditors, and insurers who offer consultancy, banking, legal, insurance, and accounting services.
- Legitimate Reasons: We have other legitimate reasons for such disclosure.
- In instances where we share your information with third parties, we mandate these
 parties to uphold the security of your personal data and handle it in accordance with the
 law.

Moreover, when necessary, we may share your personal information with additional third parties, such as in the context of a potential sale or restructuring of the business.

Transferring your personal information outside of the EEA

In some cases, it might be essential to transfer your personal information outside of the European Economic Area (EEA) to utilize service providers located in global jurisdictions. Should such a transfer be necessary, we will always ensure compliance with relevant laws and regulations, while prioritizing the security of your personal information.

Securing and protecting your personal information

We prioritize the utmost protection and security of your personal information. To achieve this, we have implemented robust security measures to prevent accidental loss, unauthorized access, misuse, alteration, or disclosure of your data.

Furthermore, access to your personal information is restricted to employees, agents, contractors, and other relevant third parties who have a legitimate business need to access it. They are obliged to process your personal information solely based on our instructions and are bound by a duty of confidentiality.

In the event of any suspected security breach involving personal information, we have established appropriate procedures to address the situation. If legally required, we will promptly notify you and any relevant regulatory authorities of such breaches.

Keeping your personal information for as long as necessary

We adhere to the principle of retaining your personal information only for the duration necessary to fulfil the purposes for which it was collected, unless there are other legitimate reasons for its retention, such as satisfying legal, accounting, or reporting obligations.

In determining the appropriate retention period for personal information, we take into account several factors, including:

The quantity, nature, and sensitivity of the personal information.

The potential risks associated with unauthorized use or disclosure of your personal information.

The purposes for which we process your personal information and whether those purposes can be achieved through alternative means.

Relevant legal requirements.

Each Privacy Notice provided will outline the specific retention period applicable to the personal information it addresses.

Under certain circumstances, we may anonymize your personal information (rendering it unable to be associated with you) for research or statistical purposes. In such cases, we reserve the right to use this anonymized information indefinitely without further notice to you.

Exercising your legal rights

Under certain circumstances, you have specific rights by law, including:

- Access to Personal Information: You have the right to request access to the personal
 information we hold about you. This allows you to obtain a copy of your data and verify
 that we are processing it correctly.
- **Correction of Personal Information:** You can request the correction of any incomplete or inaccurate personal information we hold about you.
- **Erasure of Personal Information:** You have the right to request the deletion or removal of your personal information where there is no valid reason for us to continue processing it.
- Restriction of Processing: You can request the suspension of processing your personal
 information, for example, if you want us to verify its accuracy or the purpose for which it
 is being processed.
- Data Portability: You have the right to request the transfer of your personal information to another party.

To exercise any of these rights, please contact us at sales@adsupplygroup.com

In most cases, you will not be charged a fee to access your personal information or to exercise any of your rights.

We may need to request specific information from you to confirm your identity and ensure your right to access your personal information (or to exercise any other rights). This is a security measure to prevent unauthorized disclosure of personal information.

Dealing with cookies

Not all cookies are detrimental! In fact, many websites, including the AD Supply Group site, utilize cookies to enhance website functionality. These cookies enable the website to "remember" you, either for the duration of your visit (known as a 'session cookie') or for subsequent visits (referred to as a 'persistent cookie').

Exercising your right to withdraw consent

You have the right to withdraw your consent at any time (where we rely on consent as the lawful basis for processing your personal information.

To withdraw your consent, please e-mail <u>sales@adsupplygroup.com</u> or use the unsubscribe function in any e-mail we send.

Changes to this privacy notice

From time to time, we may find it necessary to update this privacy notice to accurately reflect how we collect and utilize your information. Should such updates occur, we will promptly notify you, either through email or by posting a notice on the website. This ensures that you have the opportunity to review any changes made.