

## MONARCH WATER LTD – PRIVACY POLICY

Monarch Water Ltd (“we”, “us” or “our”) respects your privacy and is committed to protecting your personal data. This privacy policy (the “Policy”) will inform you as to how we look after your personal data when you visit our website located at <https://www.monarchwater.co.uk> (the ‘Website’) and/or purchase our products or services.

This Policy aims to give you information on how we collect and process your personal data through your use of our Website, including any personal data you may provide through our Website when you register an account or purchase a product.

Our Website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Policy together with any other privacy policy 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.

Amendments and updates to this Policy may be made from time to time. Any revisions will be posted on this page, so you will always be aware of what information we collect and how we use that information. Please review this page regularly so that you are aware of any changes.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

For the purposes of data protection laws, Monarch Water Ltd (06590010) is the controller and responsible for the Website.

We have a Privacy Manager who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the Privacy Manager using the details set out below:

Full name of legal entity: Monarch Water Ltd

Email address: [marketing@monarchwater.co.uk](mailto:marketing@monarchwater.co.uk)

### 2. CHANGES TO YOUR INFORMATION

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data (eg. name or address) changes during your relationship with us so that we can update our records.

### 3. THE DATA WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

“Personal data” 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).

#### Information you provide

We will collect personal data relating to you that you provide when you:

- fill in a contact form on our Website;
- subscribe to any of our services;
- register for a free trial;

- login to our portal and/or any of our apps;
- respond to a survey;
- request to download guides or other resources on our Website;
- engage with us via our social media channels; and/or
- opt-in to receive marketing communications from us.

This information includes personal data, such as your full name, email address and telephone number, job title, department, preferences and our communications with you.

We may also collect information relating to your organisation, such as your company name, company annual revenues and the type of industry you operate within, as well as billing and payment details, financial transaction details, credit information and history.

### **Information we collect about you**

For each of your visits to our Website, we may automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

### **Special categories of personal data**

We do not collect Special Categories of personal data about you.

### **If we are unable to collect required personal data from you**

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 ordered from us but we will notify you if this is the case at the time.

#### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to and for the purposes set out in this Policy. These are:

- When you give your consent
- When necessary for the performance of a contract we have entered into or are entering into with you
- When necessary to comply with a legal or regulatory obligation
- For our legitimate interests or those of a third party, provided that your interests and fundamental rights and freedoms do not override those interests.

We may use your personal data in the provision and administration of the services that you have requested and/or to respond to your queries. Where you don't provide us with certain information we may be unable to process your order.

We may also use your personal data to meet our legal obligations, to deal with any complaints and for the enforcement of our terms and conditions.

We may use your personal data for our legitimate business interests which include security purposes, improvements to our Website, improvements to our solutions and services and for general marketing purposes. We will not do so though where our interests are outweighed by your interests, rights and freedoms.

#### **Purposes for which we will use your personal data**

We have set out below a description of the ways we plan to use your personal data:

- to register you as a new customer;
- to process and deliver your order including managing payments, fees and charges and collecting and recovering any monies owed to us;
- to manage our relationship with you which will include notifying you about changes to our terms or privacy policy and/or asking you to leave a review or take a survey;
- to send you newsletters, to keep you updated on new products or services or to recommend other goods or services that may be of interest to you, to let you know about special offers and to invite you to our events only where you have given us your consent to receive these communications. For more information on how we may market to you please see the section of this policy called 'Marketing Communications';
- to administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- to deliver relevant website content and advertisements to you and measure or understand the effectiveness of that advertising;

- to use data analytics to improve and develop our Website, products/services, marketing, customer relationships and experiences.

### **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 would like to have an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Privacy Manager using the details set out above.

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. DATA STORAGE –HOW LONG AND WHERE?**

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. Where processing is based on your consent, we shall only process your personal data until such time as you withdraw your consent.

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.

We will take all reasonable steps to ensure that your personal data is treated securely and in accordance with this Policy.

### **6. DISCLOSURES OF YOUR PERSONAL DATA**

We will not sell your personal data and generally do not give your personal data to third parties but there are some exceptions. We may share your personal data in the following ways (as appropriate):

- in order to provide any services requested by you which may involve us sharing your personal data with our authorised partners/sub-processors
- with any actual or prospective seller or buyer of our business and/or any assets. Information held by us about our customers and any users will be one of the transferred assets;
- with our group companies, which means our subsidiaries and holding companies and any subsidiary or holding company of the same;
- in order to comply with any legal obligation or as otherwise permitted by law;
- for debt collection purposes;

- for security purposes or to protect our rights or those of a third party;
- in the conduct or defence of legal claims or in order to enforce our terms and conditions; and
- for the purposes of the prevention or detection of offences, and/or the apprehension or prosecution of offenders, we may share any personal data that we collect with the Police, other public or private sector agencies, governmental or representative bodies in accordance with the relevant legislation. This will include public authorities, insurance companies, finance companies and/or other agencies.

There may be circumstances where we are required to transfer your personal data outside the UK. We will only transfer your personal data outside the UK on the basis that appropriate safeguards have been put in place.

## **7. MARKETING COMMUNICATIONS**

You will receive marketing communications from us where you have requested information from us or purchased goods or services from us or registered for a promotion. We will not send marketing communications to you where you have opted out of receiving these.

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes.

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.

## **8. 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 and access the same. 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.

## **9. YOUR LEGAL RIGHTS**

Under data protection law you have the following rights in respect of your personal data:

- to request information regarding the personal data that we hold about you and the source(s) of that information. You can request a copy of any personal data we hold about you. This service is usually free of charge, although we have the right to charge a 'reasonable fee' in some circumstances;
- to request that we rectify any inaccuracies in relation to the personal data we hold;
- in some circumstances, to request the erasure of your personal data;
- to request the restriction of the processing of your personal data;

- to object to any processing of your personal data;
- in some circumstances, to request that your personal data be transferred to you or a new provider if the data is processed automatically; and
- to withdraw consent to us processing your personal data. This will not affect the processing already carried out with your consent.

If you wish to exercise any of the rights set out above, please contact our Privacy Manager using the details set out in this Policy.

You also have the right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner's Office. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **10. LINKS**

Our 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.

## **11. COOKIES**

Our Website uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our Website. Please refer to our Cookie Policy for more information about the cookies we use and the purposes for which we use them.

## **12. CONTACT**

Questions, comments and requests regarding this Policy are welcomed and should be sent by email to the Privacy Manager at the email address set out above.

*Last amended October 2022.*