

PRIVACY NOTICE

INTRODUCTION

This Privacy Notice applies only to personal data collected on the Site on which it appears and any sub-sites hereof (together the “Site”). If you believe that swlDch holds personal data about you collected elsewhere, and you want to exercise your rights regarding that data, please communicate with us using the same contact details provided below.

swlDch is committed to protecting any personal data you provide to us and to process your personal data in accordance with this Privacy Notice, any applicable laws, including the UK Data Protection Act (2018), GDPR, and applicable industry guidelines, including those established by the Interactive Advertising Bureau, American Association of Advertising Agencies and Direct Marketing Association.

The purpose of this Privacy Notice is to provide clear notice about the user information we may collect online in connection with our Site, how that data is processed and stored, and how you can request access to, correction of and deletion of any personal information that we hold about you.

This Privacy Notice may be updated from time to time. You may access the current version at any time by clicking on the “Privacy Notice” link at the footer on our Site.

INFORMATION WE COLLECT

PERSONAL INFORMATION

In operating our Site we may collect and process the following data about you: Details of your visits to our Site and the resources that you access including, but not limited to, traffic data, location data, weblog statistics and other communication data. Information that you provide by filling in forms on our Site, such as when you register to receive information such as a newsletter or contact us via the contact us page. Information provided to us when you communicate with us for any reason.

WHAT INFORMATION DO WE SPECIFICALLY COLLECT?

We may collect, store and use the following kinds of personal information: Information that you provide to us for the purposes of registering with us (including Names, Job Title, Company Name, Email Address, Telephone

Number, Postal Address, Country, Interests). Any other information that you choose to send to us. swIDch does not knowingly collect or process any special category personal data on the Sites. swIDch does not knowingly collect or process any data from children.

HOW YOUR INFORMATION WILL BE USED

We will keep your information that we collect on the Site for a reasonable period for the purposes set out in this Privacy Notice. We follow generally accepted online advertising industry standards to ensure that your personal data disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. These standards include undertaking necessary physical, electronic, and management activities required to protect data integrity, access, and use. Your information will not be subjected to any automatic decision procedures. Personal data provided to us may be used, without limitation, for the following purposes: provide you with requested products and services; administration; internal analysis to improve or more effectively tailor swIDch's Site; business or offerings generally; direct marketing, where you have ticked the option; any other purpose you have consented to or which is allowed under applicable law; to send to you marketing communications relating to our business which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (if you agree to direct marketing and subsequently change your mind, you have the right to object to this processing by emailing info@swidch.com or clicking on the 'Unsubscribe' button on the email communication you receive from swIDch); and to deal with enquiries and complaints made by or about you relating to the Site.

NON-PERSONAL INFORMATION

In some instances, swIDch may collect non-personal (aggregate) data through cookies and Web beacons. This information is used to better understand and improve the usability, performance, and effectiveness of the Site. Please read the "Cookies" section below for more information.

YOUR RIGHTS AND ACCESS TO PERSONAL INFORMATION

YOUR RIGHTS

You have the right to access your data, to obtain a copy of your data, to request their erasure or rectification, or request your data to be ported to

another data controller. You also have the right not to be subject to purely automated decision-making, the right to object to processing, to withdraw consent and to complain to the supervisory authority, which is:

Information Commissioner's Office

Wycliffe House Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: +44 (0)303 123 1113 (local rate) or +44 (0)1625 545 745 if you prefer to use a national rate number

Fax: +44 (0)1625 524 510

Web: <https://ico.org.uk/global/contact-us/>

EXERCISING YOUR RIGHTS

swIDch tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018 and/or GDPR "Right of Access" If we do hold information about you we will:

- confirm that your data is being processed;
- provide you with access to your personal data;
- provide other supplementary information; and
- provide the above to you within one month of receipt of the request.

To make a request to swIDch for any personal information we may hold, you can request this by emailing using the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be free with exception when:

- The request is manifestly unfounded or excessive, particularly if it is repetitive, at which point we will charge a reasonable administrative fee in order to process the request.
- A reasonable administrative fee can also be charged to comply with requests for further copies of the same information.
- We also require the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

We will provide the information in a commonly used electronic format or secure remote access self-service system if possible.

We may withhold such personal information to the extent permitted by law. You may instruct us not to process your personal information for marketing purposes by email at any time. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal information for marketing purposes.

COOKIES AND OTHER TECHNICAL INFORMATION

When you enter the Site, you are given the choice of whether to accept or decline cookies. If you decline, your information will not be tracked when you visit the Site. A single cookie will be used in your browser to remember your preference not to be tracked. To make full use of the personalised features on the Site, your computer, tablet or mobile phone will need to accept cookies, as we can only provide you with certain personalised features of this Site by using them.

Our cookies don't store sensitive information such as your name, address: they simply hold the 'key' that, once you're signed in, is associated with this information. However, if you accept cookies and want to change this, you can restrict, block or delete cookies from our Site, or any other website, using your browser. Each browser is different, so check the 'Help' menu of your particular browser (or your mobile phone's handset manual) to learn how to change your cookie preferences.

WHAT IS A COOKIE AND HOW TO I MANAGE THEM?

A cookie consists of information sent by a web server to a web browser and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We use session cookies on the Site. Session cookies will be deleted from your computer when you close your browser. We will use the session cookies for the following purposes: To prevent accidental contact form resubmissions. Each browser is different, so check the 'Help' menu of your particular browser (or your mobile phone's handset manual) to learn how to change your cookie preferences.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking Tools, Internet Options, Privacy, and

selecting Block all cookies using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

PEOPLE WHO CALL US

When you call swIDch we collect contact information to enable us to call you back as quickly as possible. This information will be stored on our CRM database to allow our teams to deal with your enquiry in the best possible way.

WHO YOUR INFORMATION WILL BE SHARED WITH

We may disclose information about you to any of our employees and subcontractors insofar as reasonably necessary for the purposes as set out in this Privacy Notice. In addition, we may disclose your personal information in the following circumstances:

- To the extent that we are required to disclose information by law.
- In connection with any legal proceedings or prospective legal proceedings.
- In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).
- Except as provided in this Privacy Notice, we will not provide your information to third parties.

SECURITY OF YOUR PERSONAL INFORMATION

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure (password and firewall protected) servers.

swIDch is dedicated to maintaining the security of personal data and preventing unauthorised access through the implementation of appropriate technical and organisational measures, as far as is reasonably possible. Such security measures also include that personal data may be accessed only by a limited number of persons within swIDch.

Our employees are made aware of and must comply with swIDch's security standards. When we occasionally use third party contractors to perform tasks that might otherwise be performed by our employees, these contractors are contractually bound to adhere to this Privacy Notice and they are subject to similar restrictions as our employees.

PRIVACY NOTICE AMENDMENTS

swIDch reserves the right to change this Privacy Notice at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this Privacy Notice on the homepage of the Site and/or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such substantial changes will take effect seven (7) days after such notice was provided on our Site or sent by email. Otherwise, all other changes to this Privacy Notice are effective as of the stated "Last Revised" date and your continued use of the Site after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes

THIRD PARTY WEBSITES

You might find links to third party websites on our Site. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

UPDATING INFORMATION

Please let us know if the personal information which we hold about you needs to be corrected or updated.

CONTACT

If you have any questions about this Privacy Notice or our treatment of your personal information, please write to us by email to: info@swidch.com or by post to Suite 112, 8 Duncan Street, London, N1 8BW, UK.