

# Privacy Policy

AlanDick Communications Group (Trading as ADComms) is one of many subsidiaries of Panasonic. The businesses draw on a wealth of experience in handling private data and abide by a privacy policy that takes account of their combined current activities and future requirements.

We take security and use of your details very seriously and adhere strictly to the requirements of the GDPR (General Data Protection Regulation) and Data Protection Act 2018.

This Privacy Notice describes how we collect, manage and use the information you provide to us called ("personal information") when using our website and services.

The Privacy Notice applies to services, devices, products, websites or applications that refer to or link to the Privacy Notice (collectively, our "Services") and will apply whether you access our Services using a computer, mobile phone, tablet, TV, or other device.

## What is Personal Information?

For the purposes of this Privacy Notice, "**Personal Information**" consists of any information that relates to an identified or identifiable individual (such as you). For example, information which identifies you may consist of your name, address, telephone number, photographs, payment details, location data or an online identifier (e.g. cookies and your IP address). Information which does not identify you on its own but that we link to you also qualifies as Personal Information.

## What Personal Information do we collect about you?

Some Services we offer require you to give us your Personal Information.

When you create an account on our website or request information, we ask you to provide certain Personal Information, such as your gender, first name, last name, email address, date of birth and country of residence. The required specific information may vary on the service you have chosen. Where you are creating an account to purchase products or services, we will ask you to provide your mailing address billing address and payment details in order to process your order. You will use your email address and your password to login to your account.

When you contact us or interact with our customer support representatives via email, live chat, telephone or in person, we may collect Personal Information, such as your name, mailing address, phone number, email address and contact preferences; and we may also collect information about the products or devices you own, such as their serial numbers and date of purchase. We also may create logs/reports that are useful in diagnosing product or application performance related issues, and capture information relating to the issue. We use this information to provide you with customer and product support.

We may access your account in order to provide you with the necessary assistance or support you require or have requested. We may also record and review your conversations with our customer support representatives for training and complaints handling, and to review any information you have provided in response to a voluntary customer survey(s). We will only record and/or review your conversations with us where we are permitted to do so by applicable laws and we will tell you that we are doing so at the start of the conversation at the latest.

### **Information about your use of the Services**

We may collect information about your use of our Services through software on your device/product and other means, or your use of our online applications. For example, we may collect:

- I. **Device/product information** - such as your hardware model, the MAC address of the device's wireless network interface and the mobile phone number used by the device in case you contact the customer service, mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, and other unique device identifiers, IP address, operating system details, and settings of the device you use to access the Services.
- II. **Log information** - such as the time and duration of your use of the Service, search query terms you enter through the Services, and any information stored in cookies that we have set on your device (such as your pc, mobile phone or tablet) or our application.
- III. **Location information** - such as your product or device's GPS signal or information about nearby WiFi access points and cell towers that may be transmitted to us when you use certain Services. Some of our location-enabled Services require your Personal Information for the feature to work. If you wish to use this particular feature, you will be asked to consent to your data being used for this purpose at the time of data collection. You can withdraw your consent at any time by altering the settings in your device/product.
- IV. **Other information** - about your use of the Services, such as the online applications you use, the websites you visit, and how you interact with content offered through our Services.

### **Personal Information from third party sources**

We may receive Personal Information from third parties (i.e. other companies), for further details on this please see the following additional information:

- I. **Information from publicly available sources** - We may receive Personal Information about you from publicly available sources, provided the receipt of such information is in accordance with applicable laws, which we may combine with other information we receive from or about you.
- II. **When you login to account with your social media credentials** - We also may receive information about you from social networking sites when you choose to connect with those sites.

We recommend that you become familiar with the functioning of the social networks you use so that you know how you can control your Personal Information and its sharing with us using any privacy setting in your account.

- III. **Information from Retailers and Service Centre's** - We may receive Personal Information about you from a retailer and/or service Centre in relation to a product that you have purchased in order for us to carry out support and warranty services. We recommend that you check with your chosen retailer and/or service center if you have any questions or concerns about what Personal Information about you, they will share. We can confirm that we will only use the Personal Information received from retailers and/or Service Centre's for the legitimate purposes explained here.

### **On which legal basis do we process Personal Information?**

We will only process your Personal Information when:

- I. we have obtained your prior unambiguous consent.
- II. the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request.
- III. the processing is necessary to comply with our legal or regulatory obligations.
- IV. the processing is necessary to protect your vital interests or those of another natural person; or
- V. the processing is necessary for our legitimate interests except where they are overridden by your interests or fundamental rights and freedoms. Examples of such 'legitimate interests' include:
  - a. to benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers),
  - b. to protect the security of our IT systems, architecture and networks; and
  - c. to meet our corporate and social responsibility objectives.

### **How do we use your Personal Information?**

We may use the Personal Information we collect for the following purposes:

- I. **Create an Account/Log in on our Websites or Applications** – to enable you to create a profile on our websites or applications and to enable you to log in to such websites or applications.
- II. **Registering products/devices** - to register you or your device or product for any of our Services.
- III. **Online Purchases** – to facilitate online purchase of our Services through our online shop(s) website or other application, and to provide any checkout assistance that you may require, for example, to complete your purchase if you were suffering from technical difficulties;
- IV. **Provide our Services** - to provide our Services or any specific feature that you request, including to enable us to fulfil our obligations under any contract with you (such as, any product or device warranty);
- V. **Surveys** – to ask for your opinions or comments on our Services and to conduct other surveys.
- VI. **Customised and Targeting Content** - to provide customised content and make recommendations based on your past activities on our Services. We may use Personal Information to more effectively target our Services, content, recommendations, advertisements and communications

- VII. **Marketing activities** - to provide you with newsletters and other communications by post, email, telephone and/or text message (SMS), only if you have provided your consent or we are otherwise permitted to do so under applicable law.
- VIII. **Profiling** – to make predictions about your interests and provide you with direct marketing on that basis.
- IX. **Advertising** - for advertising, such as providing customised advertisements and sponsored content and sending you promotional communications.
- X. **Analysis Purposes** - for assessment and analysis of our market, customers, products, devices and other Services (including asking you for your opinions on our products and services and carrying out customer surveys);
- XI. **Statistics** – to create anonymous, aggregated statistics about the use of our Services. This anonymised data may be shared with third parties;
- XII. **Service Improvement** – to develop and improve new and existing products and Services, recommendations, advertisements and other communications and learn more about your preferences.
- XIII. **Customer Support Services** - to provide customer support services for your device or product, or to deal with any other support queries you may have (such as complaint handling);
- XIV. **Business Purposes** - for business monitoring and internal record keeping;
- XV. **Publish your comments** – where you upload product or device reviews, comments or content to our websites or applications, or where you have responded to a voluntary survey, we may link to, publish or publicise your comments including in our own advertisements;
- XVI. **Security** – to protect our customers (e.g. to prevent spam or attempts to defraud users of our Services); to operate and maintain the security of our Services (e.g. to prevent or stop an attack on our systems or networks); or to protect the rights or property of ADComms, including enforcing any terms or agreements governing the use of our Services;
- XVII. **Legal Obligations** - to comply with our legal obligations under UK law or under European Union law.
- XVIII. **Competitions and Promotions** - to conduct Activities and record your participation thereto, as permitted by law as well as to provide your Personal Information to our partners and sponsors of such Activities.
- XIX. **Training** – for staff training and quality assurance purposes, particularly in relation to our customer support representatives.
- XX. **Updates** - to communicate with you, including communicating with you about your account, profiles or transactions with us, giving you important information about your products, devices, application or other Services, sending you notices about any material changes to our Privacy Notice;
- XXI. **Corporate Transaction** – to manage corporate transactions involving our company including reorganisation, merger, transfer, sale, joint venture, assignment or other disposition of all or any portion of ADComms business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding.

## To whom and where do we disclose your Personal Information?

We will not disclose your Personal Information to third parties for their own independent marketing or business purposes without your consent. However, we may disclose your Personal Information to the following entities:

### Third party recipients of the Personal Information

- I. **ADComms Affiliates** - We may need to transfer your Personal Information to other ADComms Affiliates to provide the Services you require or any other services/assistance you request. All ADComms Affiliates are required to follow the privacy practices set forth in this Privacy Notice.
- II. **Selected Partners** - We may share your Personal Information with our carefully selected business partners, including wireless carriers. These partners may use your Personal Information to provide you with ADComms Services you request (such as, video content), make predictions about your interests and may provide you with promotional materials, advertisements and other materials.
- III. **Service Providers** - We use third party service providers to help us to administer certain activities and services on our behalf, such as general product support and warranty repairs, fulfilling your purchases and delivering products, administering Activities eg: processing entries, redemptions and claims, processing credit card payments, sending postal mail and emails, sending text messages (SMS), providing advertisements, analysing usage of our Services, tracking effectiveness of our marketing campaigns, allowing users to connect to their social network, providing fraud checking services and customer support services. We may share Personal Information about you with such third-party service providers solely for the purpose of enabling them to perform services on our behalf and they will operate only in accordance with our instructions.
- IV. **Social Network Providers** - We may provide your Personal Information, such as your email address, to certain social networking providers so that they can help us display advertisements about our Services on your social network pages. We will only share your Personal Information with social networking providers in accordance with your marketing preferences and any applicable laws.
- V. **Third parties when required by Law or to Protect our Services** - We will disclose your Personal Information to comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies; to protect our customers (e.g. to prevent spam or attempts to defraud users of our Services); to operate and maintain the security of our Services (e.g. to prevent or stop an attack on our systems or networks); or to protect the rights or property of ADComms, including enforcing any terms or agreements governing the use of our Services.
- VI. **Anonymous statistics** - We prepare and develop anonymous, aggregate or generic data and statistics for various reasons (as indicated in this Privacy Notice). As this data is anonymous (i.e. you cannot be identified from it) we do not consider this information to be Personal Information. As such, we may share it with any third party (such as our Affiliates, partners, advertisers or otherwise).
- VII. **Other Parties With Your Consent or At Your Direction** - We may share Personal Information about you with third parties when you consent to or request such sharing.



## **International Transfer of Data**

The Personal Information that we collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic Area ("**EEA**"), including but not limited to Canada and Japan or in any other country which do not offer an adequate level of data protection as recognised by the European Commission and where ADComms or its Affiliates, subsidiaries or service providers maintain facilities.

Where we transfer your Personal Information outside the EEA, we will ensure that suitable safeguards such as appropriate transfer agreements and mechanisms (such as the EU Model Clauses) are in place to help ensure that our third party service providers provide an adequate level of protection to your Personal Information. You may request additional information in this respect and obtain a copy of the relevant safeguards upon request through sending a request to the contact indicated in the Contact Us/Further Information section of this Privacy Notice, below.

## **What do we do to keep your Personal Information secure?**

ADComms have put in place appropriate physical and technical measures to safeguard the Personal Information we collect in connection with our Services.

These measures take into account:

- I. available technology.
- II. costs of implementation.
- III. nature of the data; and
- IV. the risk of the processing.

The purpose thereof is to protect against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing.

However, please note that although we take appropriate steps to protect your Personal Information, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

## **Encryption**

All Personal Information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services, WorldPay Ltd will be encrypted using Secured Sockets Layer technology.

## **Other security measures**

All central European IT systems are externally assessed and fall under the information security management rules applicable.

## **What are your rights and how can you exercise them?**

### **What are your rights?**

ADComms will collect, store and process your Personal Information in accordance with your rights under any applicable data protection laws.

Your rights under the GDPR include, the right to access a copy of your Personal Information, the right to request the correction or the update of any inaccurate Personal Information and the right to object to the processing of your Personal Information under the conditions set out in applicable law.

You also have the right to request the erasure of your Personal Information and, where you have consented to the processing of your Personal Information, you have the right to withdraw such consent at any time (without this withdrawal affecting the lawfulness of the processing prior to such withdrawal). In addition, you also have the right to data portability in certain cases. This is the right to request the return of the Personal Information you have provided to us in a structured, commonly used and machine-readable format and to request the transmission of such Personal Information to a third party, without hindrance from us and subject to your own confidentiality obligations.

### **Exercising your rights**

If you wish to exercise any of the above rights, please contact us by using any of the communication means below in the Contact Us/Further Information section of this Privacy Notice.

### **Complaints**

If you are not satisfied with how we process your Personal Information, you may contact us using any of the communication means below in the Contact Us/Further Information section of this Privacy Notice or alternatively you may file a complaint with the competent supervisory authority, in addition to your rights outlined above.

### **Data Retention – How long we will store/keep your Personal Information**

We will retain your Personal Information for the period necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this Privacy Statement unless a longer retention period is required by law. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

## **Third-Party Links and Products on Our Services**

Our websites, applications and products may contain links to other third-party websites that are not operated by ADComms, and our websites or your product and devices may contain applications that you can download from third parties. These linked sites and applications are not under ADComms' control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third-party websites or applications, any Personal Information collected by the third party's website or application will be subject to any existing privacy policy of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Information.

## **Cookies**

### **What are cookies?**

ADComms, as well as certain other third parties that provide content, advertising, or other functionality on our Services, may use cookies and other technologies in certain areas of our Services. Cookies are small tracking codes that can be read by a web server in the domain that put the cookie on your hard drive. We may use cookies to store your preferences and settings, help you with signing in, provide targeted ads, and analyse site operations.

Please note that you can modify your browser so that it notifies you when cookies are sent to it. If you do not want to receive cookies, you may also refuse cookies altogether by activating the relevant settings on your browser. Please note that if you choose to refuse all the cookies, some features of the Services may not be accessible to you or not work properly. Finally, you can also delete cookies that have already been sent.

### **Your Choices (e.g. marketing related emails or otherwise)**

We and other ADComms Affiliates may use your Personal Information (such as your contact details (e.g. first name, last name, address, email address, telephone number) to send you marketing-related correspondence by post, email, telephone and/or text message (such as SMS) related to ADComms products, devices and other Services in accordance with your email and in accordance with your marketing preferences.

When you purchase ADComms products or devices, contact our customer support representatives, create an account or profile for one of our Services, or subscribe to one of our Services, you may be given the opportunity to opt-in to the receiving of marketing communications.

We do not share Personal Information with third parties for the third parties' marketing purposes.

We may also use your Personal Information to personalise and to target more effectively our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you.



To opt out of receiving marketing-related correspondence from ADComms, please update your email and contact preferences.

### **Changes to this Privacy Notice**

ADComms may change this Privacy Notice from time to time. The “Date last updated” at the bottom of this page states when the notice was last updated, and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by email or by posting notice of the changes on the ADComms website or through any relevant Services.

### **If you have questions about privacy protection, please contact us at:**

ADComms  
Billet Lane  
Normanby Enterprise Park  
Scunthorpe  
DN15 9YH

### **Transfer of your personal information**

The Internet is a global environment. By using the service, you send information electronically to us, and such data may be transmitted over the Internet internationally depending on your location. Keep in mind that the Internet is not a secure environment, and this Privacy Policy applies only to our use and disclosure of your personal information, to the extent that they are in our possession and under our control. In view of the open nature of the Internet, all Internet transmissions are at your own risk.

### **Contact Us / Further Information**

Please contact us if you have any questions regarding the collection, processing, or use of your Personal Information or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Privacy Notice or delete any of your Personal Information.



Carl Pocknell

MD ADComms

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