

Privacy and cookies policy



Group PLC
Innovation Quality Service

In order for us to operate our business and provide our services to you, it is sometimes necessary for us to collect or process information about you. In general terms, this information will take one or more of the following forms:

- 1.** Information that you provide to us directly, such as in the situation where you complete an online form or send us a message via our website;
- 2.** Information that is automatically sent to us by your computer's internet browser when you visit our website, such as your computer's technical address (or 'IP address') or information about which particular internet browser you are using and so on;
- 3.** Information about how you use our website or our services, such as which pages you visit, how frequently you visit the site and so forth.

This privacy policy sets out the detail of what information we collect, as well as how that data is used and protected.

Our commitment to data privacy

We are fully committed to maintaining the privacy of any information ('personal data') that you provide to us. Furthermore, we commit to ensuring that such data is held securely, used appropriately and only retained for as long as is necessary.

Our systems and services are designed with privacy in mind, and we operate a 'data minimisation' principle wherever possible - that is to say that we will only ever ask you for the minimum amount of information required to provide our services efficiently; we have no desire to retain (and therefore maintain) any more information than is necessary. We aspire to comply to the fullest extent possible with applicable data protection regulations, in particular the European Union's General

Data Protection Regulation ('GDPR') and ePrivacy Directive, where applicable. The rules on processing of personal data are set out in the General Data Protection Regulation.

Who are we?

In terms of your use of this website, We, SMP Group PLC, act in the capacity of Data Controller, and should you have any questions or concerns about the data we hold about you, we can be contacted using the information below:

Data Controller: SMP Group PLC

Registration: ZA083556

Correspondence address: 2 Swan Rd,
London SE18 5TT

Email correspondence:

info@smpgroup.co.uk

Definition of 'personal data'

When we refer to 'personal data' we mean any information that allows us to identify you personally. Obvious examples include your name, email address, postal address etc. We will always seek to gain your explicit consent to providing this information before we collect it from you, although this may not be the only legal basis on which we collect the data. Other types of information, such as your computer's 'IP' address or broad geographical location do not, generally, allow us to identify you directly. However, because in their current form, European data privacy regulations are somewhat vague in this regard, we will cover the use of such data here also.

Who we share data with

We operate on a strict 'need to know' basis for all data that we work with, and that is particularly true for any personal data. The only people/organisations that are granted access to personal data are:

- Employees of SMP Group PLC who provide services;
- Third party marketing agency, Yogurt Top Marketing Ltd.

How your data is protected

We take the security of all personal data very seriously, and that data is protected in a number of ways:

This website is secured with SSL encryption, which means that all traffic to

and from our servers is encrypted. This applies to our own administrative access to the website as well as that of users of our services.

- Selection of third party service providers: we use a very limited number of third party service providers, but some are essential for the provision of physical hosting environments and cloud services.
- ICO registration number: ZA083556 We are registered with the Information Commissioner's Office, the UK's data regulator, ensuring that our data privacy record and reputation is available in the public domain.

Access to your personal data

In the situation where you have directly provided personal information to us (such as by completing an online form or contacting us for further information), you have a number of rights regarding the personal data that we hold:

- You have the right to obtain from us confirmation about whether any such data is being held;
- You have the right to require that we provide you with whatever data we are holding/processing about you, including the right for that data to be transferred to another data controller;
- Even if you have consented to Us processing your personal data, you have the right to withdraw that permission at any time;

- You have the right to require us to rectify any incomplete or incorrect information held about you;
- You have the right to require us to erase the data held about you (the 'right to be forgotten');

In the situation where we collect personal data automatically (such as from your internet browser or via internet Cookies or other similar technologies):

- You have the right to object to the legal basis upon which we are collecting this data, and We have an obligation to consider and respond to that objection;
- You have the right to request the prevention of further processing of your data while your objection is considered;
- You have the right to make a complaint to the relevant data protection authority (which, in the UK, is the Information Commissioner's Office or 'ICO')
- In most circumstances, you can exercise these rights without paying a fee to us.

Types of data collected

Website contact forms

When you complete one of the contact forms on our website, we will ask you for a number of pieces of personal information, such as your name, email address and other contact details. This is obviously required for us to respond to your request. If you do not use or submit an online form on the website, no data will be collected in that regard.

Technical data (such as 'IP address')

When you visit our website, our systems will log a record of your visit in our server logs, and typically this record will include the technical 'IP' address that is associated with your device and the browser type and version that you are using.

Such server logs are extremely common practice, and are used to monitor technical resources, monitor high-level server activity, and importantly to detect and prevent malicious or fraudulent activity on our systems. This data can also be used, if required, to diagnose reports of technical issues. The storage of IP addresses, allow us to identify patterns of behaviour (such as repeated malicious attempts to access a system).

IP addresses, in and of themselves, do not allow us in any way to identify you as an individual, especially given that it is very common for IP addresses to be dynamically allocated by your service provider, and will therefore often routinely change.

Furthermore, we do not and will not use the content of server access logs to attempt to determine an identifiable individual. We therefore do not consider that data held within server logs falls within the scope of 'personal data', and accordingly we do not seek your consent to collect it.

Cookies & 'similar technologies'

We have included cookies, web beacons and similar technologies into one section because they all perform similar functions even if, from a technical perspective, they work slightly differently.

All of these technologies allow us to better understand how users are using our website and other related services. They can also be an essential part of providing certain online functionality. They are all essentially small data files placed on your computer (or other device) that allow us to tell when you have visited a particular page, or performed a particular action (such as clicking a particular button) on our website.

These technologies are used by most websites as they provide useful insight into how the services are being used, as well as improving speed, performance and security, and enabling us to improve our personalisation of your experience.

Cookies

These are small text files placed in the memory of your browser or device when you visit a website. Cookies allow a website to recognize a particular device or browser. There are several types of cookies:

- Session cookies expire at the end of your browser session and allow us to link your

actions during that particular browser session.

- Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.
- First-party cookies are set by the site you are visiting.
- Third-party cookies are set by a third-party site separate from the site you are visiting.

There are a number of ways that you can influence how cookies are used on your particular device. Most commercial browsers (such as Chrome, Safari, Edge, Internet Explorer, Firefox etc) allow you to set preferences for whether to allow or block website cookies.

They will also provide tools that allow you to remove any cookies that have already been set. Using the 'Help' functionality of your browser, or an internet search, will help you to understand how to use these features for your particular browser.

Additionally, we have incorporated specific cookie functionality on our website that allows you to easily indicate when you first visit the site whether or not you are happy for cookies to be set on your device.

Perhaps ironically, for our site to remember your preference for whether to allow cookies or not, it is necessary for us

to set cookies for this specific purpose. When you first visit our site, a Cookie Control box will be displayed allowing you to choose whether to allow cookies or not. Only Essential cookies will be set when you first visit our site.

If you click on the 'Accept' button in the Cookie Control box, we will enable our Analytics and Marketing cookies. Alternatively, you can click the 'Settings' button, where you will see further information and have the ability to accept or reject our different types of cookies individually.

If you do not positively agree to the use of cookies in one of the ways described above, we will not set any non-essential cookies.

You can change your choice at any time by clicking on the persistent cookie icon at the bottom of the screen.

Web beacons

Small graphic images (also known as "pixel tags" or "clear GIFs") that may be included on our sites and services that typically work in conjunction with cookies to identify our users and user behaviour.

Website Analytics

We use Google Analytics to better understand what people look at on our website.

When people visit our site, information about their visit (such as which pages they look at, how long they spend on the site and so on) is sent in an anonymous form to Google Analytics (which is controlled by Google).

The data contains information about anyone who uses our website from your computer, and there is no way to identify individuals from the data.

We ensure that no personally identifiable information is ever contained within the data sent to our analytics providers, and we also perform a process which partially obscures your IP address information. As analytics information is not personal data, we do not specifically ask for your prior consent.

Other Google Services

In addition to Google Analytics, we use a number of industry-standard Google services to provide particular pieces of website content. These include:

- Google Fonts: We may use one or more of Google's web fonts to ensure that our website content is displayed in a clear and consistent fashion across all of the different types of devices and browsers.
- Google Maps: We may use the Google's mapping services to provide dynamic geographic maps on our website
- Google Recaptcha: We may use Google's

Recaptcha service (which provides the 'I Am Not A Robot' functionality) on our web contact forms. This is a security measure to prevent the abuse of our contact forms by automated programs.

Each of these services involve our website making a connection to one or more Google servers, and may result in Google placing cookies on your device.

Facebook

Like the vast majority of commercial websites, we use social media cookies from Facebook on our site. The cookies are placed by Facebook, and we use them to understand the effectiveness of social media campaigns that we operate.

If you are not logged into Facebook when you view our site, then it is not possible for any personal information about your visit to be collected, and therefore we do not specifically ask for your prior consent. If you are logged into Facebook when you view our site, then Facebook will know when you visit us. We do not have any access to the detail of that personal data, as you have consented to share it with Facebook, not us. We just get to see anonymised data about the numbers of people who have responded to our advertising or other social media activity. You can learn about Facebook's privacy policy here.

Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from your websites and elsewhere on the internet and use that information to provide measurement services and target ads. You can learn about Facebook's privacy policy here. There are a number of ways of controlling the ads that you see based upon your activity on Facebook. The following resources may help to understand those choices:

- You can opt-out of Facebook tracking on the SMP Group PLC website using the Cookie Control functionality on this site. You can edit your cookie preferences at any time using the Cookie Control icon in the bottom right hand corner of your screen, and disabling 'marketing' cookies.
- How to opt-out of Facebook interest-based advertising on your browser or mobile device: <https://www.facebook.com/help/568137493302217>
- About Ads: <http://www.aboutads.info/choices>
- Your Online Choices: <http://www.youronlinechoices.eu/>

You can always use your browser's 'private' or 'incognito' mode to browse websites anonymously.

If you disable marketing cookies on this site, it does not mean that you will not see our ads, it just means that they will not be personalised based on your Facebook activity.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact us on 020 8855 5535. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.