### Website Privacy Policy for Loop Electric Limited

At Loop Electric, we are committed to protecting the personal data that we obtain.

This privacy policy explains how we will process the data relating to you that you provide to us (or that we may collect) when you visit our website <u>www.loopelectric.com</u> (the '**Website**').

The Website is operated by Loop Electric Limited (we, us, our), a company incorporated in England & Wales with company number 9909002 and registered office at Platf9rm, Floor 5 & 6, Tower Point, 44 North Road, Brighton BN1 1YR.Where we decide the purpose or means for the processing of the personal data that you provide via our Website, we are the "data controller". As data controller, we will comply with all applicable data protection laws.This policy should be read together with our:

- Website terms of use; and
- Terms and Conditions of Installations
- Our Website may contain hyperlinks to third party websites. These websites operate fully independently
  from us and we cannot accept any responsibility or liability for the privacy practices of such third parties
  nor the availability of these external sites or resources. The appearance of such links on our website is
  not an endorsement. Should you use any of these websites, such use is at your own risk and we would
  advise that you review their respective privacy policies.

If you have any questions or comments about this privacy policy, please let us know by emailing hello@loopelectric.co.uk. Please note that we may update this policy from time to time.

### What personal information are we likely to collect about you?

In order to provide our online sales services and other related business activities, we will need to collect and process information about you.

## Information provided by you

When you use our website, whether for browsing or streaming, to enquire about an installation, you may be asked to fill in forms. We will ask you to provide us with the following information:

- your name
- your email address
- your phone number

If you decide to make a purchase, we will also need you to provide:

- your billing address
- your preferred installation address (if applicable)

We may also obtain additional personal data, which could include special categories of personal data (i.e. personal data of a more sensitive nature), when you voluntarily supply information through our website such as free-text entries.

# Analytics

We are always trying to improve our website and to offer the best, most accessible service possible to all of our customers.

To evaluate and make improvements, we utilise third party data analytics service providers (such as Google Analytics) to improve our visibility and to monitor website browser behaviour and navigation across the website. These third party data analytics service providers collect this information on our behalf in accordance with our instructions and in line with their own privacy policies. We have contracts in place to protect the confidentiality of your information with all of our third party data analytics service providers.

When you visit our website, our service providers may collect the following data, which will almost always be anonymised and aggregated before reporting back to us:

- number of visitors to our website
- pages visited while at the website and time spent per page
- page interaction information, such as scrolling, clicks and browsing methods
- · websites where visitors have come from and where they go afterwards
- page response times and any download errors
- other technical information relating to end user device, such as IP address or browser plug-in

To find out more about how this data is collected, please read below about the use of analytics and cookies.

### How do we use your personal data and on what basis?

When you visit our website, whether to browse our content, to contact us about our services or make a purchase, we (or our third party service providers acting on our behalf) may use the personal information that you provide for the following purposes:

### Providing our products and services

- entering into an agreement with you to provide our services or products
- logging and processing your order in our information systems
- providing physical delivery by couriers of products ordered online

We collect and use this information from you to enable us to perform our sales contract with you and to enable you to access online services in line with our website terms of use and Terms and Conditions of Installations.

### **Customer Services & Enquiries**

- · replying to your enquiries or responding to concerns or complaints
- providing you with information about the services we offer, including our e-newsletter important announcements about your account, updates about our services, or developments with our company or other promotional material (where you have opted to receive these)

If you contact us to make an enquiry or to raise a concern about our website or any aspect of our online services, we aim to respond to you as promptly as possible and we do so on the basis that we have a legitimate interest in replying to you.

If you have asked to be added to our mailing list, we will provide your details to a third party company called Campaign Monitor that helps us to produce and manage our newsletters. We provide these communications on the basis that you have asked to receive these. If you change your mind, you may opt-out at any time via the unsubscribe feature that appears in our emails or by emailing hello@loopelectric.co.uk.

You may also be asked to opt in to receive updates or information or to receive promotional material, including vouchers or discount offers, from us.

## Tax and other legal obligations

- reporting VAT and other company tax reporting purposes (as required by law)
- complying with regulators, law enforcement agencies or in relation to any claims that may arise

We process personal information for the legitimate interests and under the legal obligation of ensuring that use of the Website and e-shop (i) is lawful and non-fraudulent, (ii) does not disrupt the operation of our services, (iii) does not harass our staff or other individuals, and (iv) to enforce our legal rights and comply with our legal obligations.

In accordance with our legal obligations, we may disclose your information to the extent required by law which may include for financial accounting and taxation purposes with our auditors, regulators or other government bodies such as HMRC. We may also disclose your information to third parties in order to enforce or apply our contractual terms, to investigate potential breaches, to protect the rights and freedoms, property or safety of our business or those of our customers and other individuals.

Where we reasonably believe that you are or may be in breach of any of the applicable laws, we may use your personal information to inform relevant third parties such as your email/internet provider or law enforcement agencies about the content.

If we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, the information we hold may be included as part of that sale, in which case you will be notified via email and/or a prominent notice on the site of any changes in ownership or use of your information, as any choices you may have regarding that information.

# Analytics & cookies

Our website uses cookies and other mechanisms to collect log and analytical information, to help analyse how visitors use the site and to compile statistical reports on Website activity.

Our website also uses Google Analytics and you can find out more here: <u>How Google uses data when you use</u> <u>our partners' sites or apps</u>.

To learn how to opt out of Google Analytics, please visit <u>https://tools.google.com/dlpage/gaoptout/</u> or your Google Ads Settings.

- We process this information to understand how visitors use our website and to compile statistical reports regarding that activity (for example, your IP address is used to approximate the country from which you access our website, and we aggregate this information together so we know that, for example, most of the visitors to our website come from England).
- This processing is crucial to the running of our online business and we therefore undertake such monitoring in the pursuit of our legitimate interests in improving our Website, and providing a better service and source of information to visitors.

This information is not used to develop a personal profile of you.

### **Financial Transactions**

All financial transactions via our e-shop are handled directly by our payment service providers. We will not share any personal information with these third party providers, nor will we receive any of the financial information that you provide to them. The payment providers which we use are PayPal and Stripe.

# Do we share your personal information with anyone else?

We will only ever share your information with third parties in the ways that are described in this privacy policy. If you would like to find out more about how those third parties listed in this privacy policy use your information, this should be set out in their respective privacy policies accessible on their websites.

### Personnel, suppliers and subcontractors

We keep your information confidential, but may disclose it to our personnel (including personnel in our group companies), suppliers or subcontractors (including our cloud-based data processing, data analytics and payment service providers) insofar as it is reasonably necessary for the purposes set out in this privacy policy, provided that they do not make independent use of the information and have agreed to adhere to the rules set out in this privacy policy. In some instances, this data sharing may involve the transfer of information outside the EU. Please see our section on International Data Transfers below.

By group company, we mean our subsidiaries, our ultimate holding company and its subsidiaries, as defined with reference to the definitions of "holding undertaking" and "subsidiary undertaking" in section 1162 of the UK Companies Act 2006.

We will not pass your information on to third parties for marketing purposes unless you have provided your consent, in which event the advertisements that appear when you visit our website will be targeted to provide you with more relevant advertising content and you may receive communications from third parties offering similar or related services to us.

## Your choices and rights in relation to personal data which we process relating to you

You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay, and within one month at the latest:

- to ask for a copy of data we are processing about you and have inaccuracies corrected;
- to ask us to restrict, stop processing, or to delete your personal data;
- to request a machine readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer; and
- to make a complaint to a data protection regulator. You may contact them at: <u>https://ico.org.uk/concerns/</u>

To make a request in relation to any of the aforementioned rights, please email us at hello@loopelectric.co.uk.

If you are unhappy with the way that we are processing your personal data, please let us know. The best way to bring this to our attention is by emailing us at hello@loopelectric.co.uk.

### Children

We do not knowingly use the website to solicit data from or market to children under the age of 13.

If a parent or guardian becomes aware that his or her child has provided us with information or may be receiving communications from us without consent of a parent or guardian, we ask that this be brought to our immediate attention. We will make it our priority to address this situation and delete information relating to a child as soon as practicable. In such an event, please contact us at hello@loopelectric.co.uk.

### Security

We will take commercially reasonable, appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of our website and services, taking into account the likelihood and severity those risks might pose to the rights and freedoms of our customers and other individuals who might be impacted.

In particular, we will take precautions to protect against the accidental or unlawful destruction, loss, or alteration, and unauthorised disclosure of or access to the personal data transmitted, stored or otherwise processed by us.

Please be aware that, while we make the security of our website and your personal information a high priority and we devote considerable time and resources to implementing and maintaining robust information technology security, no security system can prevent all security breaches. By choosing to share your personal information with us, you accept the aforesaid and provide your information at your own risk.

# Retention

In accordance with data protection laws and good commercial practice, we do not retain data in a form that permits identification of the person(s) to whom it relates for any longer than is necessary. Once the purpose for which information has been collected has been fulfilled, we will either permanently delete your personal information or remove all identifiers within it so that it is no longer personal data. We may use such anonymised data for research and/or business analysis purposes.

Where you have provided us with personal information in order to set up an account with us, we will retain those details for as long as your account remains active.

Where we obtain your personal data in relation to the use or purchase of our services or products, including VAT or invoicing information, we are obligated by law to keep this for a minimum of 6 years.

## **International Data Transfers**

Our servers are located in the European Union and the information that we collect directly from you will be stored in these servers. We may also transfer your personal data to our third party service providers, many of whom may be located outside of the EU, operate from multiple locations including non-EU based operations or engage subprocessors located outside the EU.

We have agreements in place with all of our third party service providers to ensure that those parties process personal data using appropriate safeguards that meet the requirements of data protection laws. Such appropriate safeguards may include standard data protection clauses adopted by a data protection regulator and approved by the European Commission, such as the European Commission's standard contractual clauses.

If you would like to find out more about these safeguards or if you have any other queries or comments in relation to this policy, please let us know by emailing us at hello@loopelectric.co.uk.