

VBN Limited Privacy Policy

WHO WE ARE

This website (the "Website") is the website of VBN Limited ("VBN Limited", "us" or "we"), a company registered in Scotland under company number SC735518 and with its registered office address at 272 Bath Street, Glasgow, Scotland, G2 4JR.

VBN Limited is committed to safeguarding and preserving your privacy when visiting our site or communicating electronically with us. This Privacy Policy, together with our Terms and Conditions, provides an explanation as to what happens to any personal data that you provide to us, or that we collect from you. We do update this Policy from time to time so please do review this Policy regularly. For the purpose of the EU General Data Protection Regulation and other data protection Regulation and laws ("data protections laws").

INFORMATION WE COLLECT

In operating our website, we may collect and process the following data about you:

- Details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs, and other communication data
- Information that you provide by filling in forms on our website, such as when you registered for information, including Name, Address, Email Address and Telephone Number
- Information provided to us when you communicate with us for any reason.

VBN Limited processes your information to meet our legal statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process information in any way, other than as specified in this notice.

USE OF COOKIES

On occasion, we may gather information about your computer for our services and to provide statistical information regarding the use of our website to our advertisers.

Cookie	Time from set/update	Purpose
ss_cid	2 years	Identifies unique visitors and tracks a visitor's sessions on a site.

Cookie	Time from set/update	Purpose
_gat ss_cpvisit	2 years	Identifies unique visitors and tracks a visitor's sessions on a site
ss_cvvisit	30 minutes	Identifies unique visitors and tracks a visitor's sessions on a site
ss_cvr	2 years	Identifies unique visitors and tracks a visitor's sessions on a site
ss_cvt	30 minutes	Identifies unique visitors and tracks a visitor's sessions on a site
crumb	End of browser session	Prevents cross-site request forgery (CSRF)
ss_cookieAllowed	30 days	Remembers if a visitor agreed to placing analytics cookies on their browser if a site is restricting the placement of cookies

By using our website, you agree that we can place these types of cookies on your device.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org

To opt out of being tracked by Google Analytics across all website visit <http://tools.google.com/dlpage/gaoptout>

To the extent that any of the cookies described above collect personal information about a user of our website that personal information will be handled in accordance with our Privacy Policy.

Such information will not identify you personally it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever.

Similarly, to the above, we may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This

cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive, and they help us to improve our website and the service that we provide to you. All computers have the ability to decline cookies, this can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website. Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

HOW WE WILL USE YOUR INFORMATION

The information that we collect and store relating to you is primarily used to enable us to provide our services to you. In addition, we may use the information for the following purposes:

- To provide you with information requested from us, relating to our products or services
- To provide information on other products which we feel may be of interest to you, where you have consented to receive such information
- To meet our contractual commitments to you
- To notify you about any changes to our website, such as improvements or service/product changes, that may affect our service.
- If you are an existing customer, we may contact you with information about goods and services similar to those which were the subject of a previous sale to you.

Further, we may use your data, or permit selected third parties to use your data, so that you can be provided with information about unrelated goods and services which we consider may be of interest to you. We or they may contact you about these goods and services by any of the methods that you consented at the time your information was collected.

If you are a new customer, we will only contact you or allow third parties to contact you only when you have provided consent and only by those means you provided consent for. If you do not want us to use your data for our or third parties, you will have the opportunity to withhold your consent to this when you provide your details to us on the form on which we collect your data. Please be advised that we do not reveal information about identifiable individuals to our advertisers, but we may, on occasion, provide them with aggregate statistical information about our visitors.

STORING YOUR PERSONAL DATA

We may transfer data that we collect from you to locations outside of the European Economic Area for processing and storing. Also, it may be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers. For example, such staff maybe engaged in the processing and concluding of your order, the processing of your

payment details and the provision of support services. In the event that any information is to be stored on servers which are hosted in non-EU countries, where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by the strict agreements and measures set out by VBN Limited to protect your data and comply with the relevant data protection laws and Regulations. By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to make sure that your data is treated securely and in agreement with this Privacy Policy. Data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our site will be encrypted to ensure its safety. The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

DISCLOSING YOUR INFORMATION

Where applicable, we may disclose your personal information to any member of our group. This includes, where applicable, our subsidiaries, our holding company and its other subsidiaries (if any). We may also disclose your personal information to third parties:

- Where we sell any or all of our business and/or our assets to a third party
- Where we are legally required to disclose your information
- To assist fraud protection and minimize credit risk.

LEGITIMATE INTERESTS

As noted in the 'How we will use your information' section of this notice, in certain circumstances we may occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

THIRD PARTY LINKS

On our website you may find links to third party websites. 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.

HOW LONG WE KEEP YOUR DATA

VBN Limited only ever retains personal information for as long as necessary and we have a strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address and contact details) for a minimum of 6 years after which it will be destroyed. There may be some circumstances where data may be erased, pseudonymized or encrypted where we are required to do and in line with our retention policies. Where you have consented to us using your details for direct

marketing purposes, we will keep such data until you notify us otherwise and/or withdraw your consent.

ACCESS TO INFORMATION

If you have any questions about this notice, our processing of your personal data, or about your rights over your personal data, our Legal and Compliance Officer can be contacted at privacy@vbnlimited.com or VBN Limited, 272 Bath Street, Glasgow, G2 4JR.

USE OF OUR WEBSITE

Other personal data that we may process about you If you are an employee or client of a member of VBN Limited or our group of companies, or you are otherwise the recipient of any product or service from a member of our holding group, then a separate privacy notice will have been made available to you, providing you with information about our processing of your personal data in that capacity.

YOUR RIGHTS AND SUBJECT ACCESS REQUEST

The EU General Data Protection Regulation and The Data Protection Act 1998 gives you the right to access the information that we process about you and to request information about:

- What personal data we hold on you
- The purpose of processing
- The categories of personal data concerned
- The recipients to whom personal data has/will be disclosed
- How long we intend to store your data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information. If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure. Should you wish to receive details that we hold about you please contact us using the contact details below.

CONTACTING US

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us by email at privacy@vbnlimited.com or write to us at:

VBN Limited, 272 Bath Street, Glasgow, G2 4JR.

LODGING A COMPLAINT

VBN Limited only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

VBN Limited

272 Bath Street, Glasgow, G2 4JR, Scotland

Telephone: 0141 53 607 53 Email: privacy@vbnilimited.com

Supervisory Authority - The Information Commissioner's Office - ICO

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

Website: ico.org.uk