

# Privacy Notice

## Introduction

Advantage Smollan Limited (“Company”, “we,” “our,” or “us”), a company registered in the United Kingdom and registered address C/O Legalinx Limited, 3rd Floor, 207 Regent Street, London, United Kingdom, W1B 3HH believes in protecting the Personal Data it collects from individuals (“users”) who access or use the website situated at <http://www.advantagesmollan.com/> (the “website”) and takes seriously its obligation to comply with applicable data privacy laws including, without limitation, the General Data Protection Regulation (“GDPR”) and Data Protection Act 2018.

We take our obligations under applicable privacy laws seriously, including those under the General Data Protection Regulation (GDPR) and Data Protection Act 2018. This Privacy Notice gives you information about how we will use personal data.

We are a Data Controller of users’ Personal Data (detailed below) which is collected through our websites, such as when users visit our websites, register for or apply for a job or submit queries through a “contact us” feature, or as otherwise described in this Privacy Notice.

## Personal Data we collect

For the purposes of this Privacy Notice, “Personal Data” means any information relating to an identified or identifiable natural person. We process the following types of Personal Data:

We provide a ‘Contact Us’ facility where you will be asked for:

- Name
- Company
- Email address
- Free text messages/comments from you which may contain Personal Data that you provide us

We collect your Personal Data using both “active” and “passive” means.

- Active means; The website actively collects Personal Data from users by asking specific questions and permitting users to communicate directly with us, for example via the Contact Us form.
- Passive means; We passively collect (i.e., without the user actively providing the information) Personal Data about a user as the user accesses and navigates through the website using various technologies and means, such as navigational data collection and cookies. Our cookie policy is outlined below.

We process your Personal Data on several different legal bases, as follows:

- Our Legitimate Interest – if you are visiting our website, you are most likely to be a client or customer (or potential one of any of these) of our outsourced sales and marketing business.
- In that respect, we process your Personal Data:

- To facilitate simple communication between you(the visitor to the website) and Advantage Smollan.
  - For the security and safety of the website, our technology connected to the website and the users of the website;
  - To detect and prevent fraud;
  - To protect and defend the rights or property of others, or our own rights and interests;
  - To manage and administer the website, including analysing web traffic and utilising web analytics solutions; and
  - For use in marketing our services to you, or affiliated entities.
- Our Legal Obligations – We may need to process your Personal Data to comply with relevant laws, regulatory requirements and to respond to lawful requests, court orders and legal process.
  - Your Prior Consent – Where we are required to do so by applicable data protection law, for placing cookies on your device (subject to certain exceptions) or sending marketing communications to you. As required by law, we provide you certain details on our use of cookies and marketing communications below.

## Cookies and web analytics used on this website

The website makes use of cookies. Cookies are small text files downloaded by your internet browser and stored on the device you use to access the website (e.g., your desktop computer, laptop, tablet or smartphone). Depending on their purpose, cookies log specific user-related information such as your user preferences, authentication information, security parameters, data concerning the devices you use to access the website, and statistical information regarding your use of the website. Where necessary during your visit to the website or when revisiting the website, your internet browser transmits the cookies including the contained information back to the servers they were initially downloaded from. The analysis and processing of such information allows us to ensure the functionality of the website, improve your online experience, and optimise the structure and content of the website.

The cookies we use can be categorised as follows:

### **Strictly Necessary Cookies**

These are cookies that are required for the operation of the website or of certain parts thereof. They either serve the sole purpose of carrying out network transmissions or are strictly necessary in order for us to provide an online service explicitly requested by you.

### **Analytical/Performance Cookies**

These cookies allow us to carry out web analytics or other forms of audience measuring such as recognising and counting the number of visitors and seeing how visitors move around the website. This helps us to improve the way the website works, for example, by ensuring that users are easily finding what they are looking for.

### **Functionality Cookies**

These cookies are used to recognise you when you return to the website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). Loss of the information in these cookies may make

our services less functional but would not prevent the website from working.

The following cookies are used on this website:

Cookie Name	Who Places the Cookie?	Cookie Category	Expires	Purpose
1P_JAR	Google	Analytics	1 Month	Google Analytics is used to track website performance and collect visitor insights. It can help organizations determine top sources of user traffic, gauge the success of their marketing activities and campaigns, track goal completions (such as purchases, adding products to carts), discover patterns and trends in user engagement and obtain other visitor information such as demographics. Small and medium-sized retail websites often use Google Analytics to obtain and analyze various customer behavior analytics, which can be used to improve marketing campaigns, drive website traffic and better retain visitors.
gtm.js?id=GTM-MJ5J36	Google	Analytics	26 Months	Google Analytics is used to track website performance and collect visitor insights. It can help organizations determine top sources of user traffic, gauge the success of their marketing activities and campaigns, track goal completions (such as purchases, adding products to carts), discover patterns and trends in user engagement and obtain other visitor information such as demographics. Small and medium-sized retail websites often use Google Analytics to obtain and analyze various customer behavior analytics, which can be used to improve marketing campaigns, drive website traffic and better retain visitors.
wp-settings-time-1	WordPress	DevStat technical cookie	1 Year	WordPress uses this cookie to customize your view of admin interface, and possibly also the main site interface
wordpress_test_cookie	WordPress	Session	Session	WordPress sets a test cookie (wordpress_test_cookie) for every visitor to check if the browser accepts cookies. More cookies are only set if the user logs in or if a plugin or theme is used that set cookies for any other purposes.
cookie_notice_accepted	WordPress		1 Month	Records that cookies have been accepted

You may influence the scope and extent to which we use cookies when you visit our website by clicking on the Accept or Decline Cookies button on entry to the site. You may also prevent cookies from being stored on your device by adjusting the respective settings on your internet browser. However, please be aware that this might render certain functions of our website inoperable or more difficult to use. Depending on the internet browser you use, you might also be able to specifically reject third party cookies. In this context, please note that third parties might still have access to your Personal Data to the extent such information is logged by first party cookies.

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Notice. You should exercise caution and look at the Privacy Notice applicable to the website in question.

## Recipients of your personal data

For the following purposes, we may disclose your Personal Data to the following third parties, as required or permitted by applicable law:

Who Is your Personal Data Disclosed To?	What Is the Purpose Underlying the Disclosure?
Companies affiliated with <b>Advantage Smollan Ltd</b> 650 Eskdale Road, Winnersh Triangle, RG41 5TS	In connection with the administration and running of the business including new business opportunities.
Third-party suppliers and service providers including: Kinsta <a href="https://kinsta.com/">https://kinsta.com/</a> 6 Pancras Square, London N1C 4AG, United Kingdom	Website hosting company To assist us in the operation or improvement of the website and to enhance our products and services
To other third parties in line with applicable legal requirements	To comply with legal obligations that we are subject to;

## Business to Business Marketing

As a part of our marketing practice, we make unsolicited contact with companies, including individual employees of such company, by telephone or email to inform them of our services that could result in a mutual commercial interest. We obtain the contact details for such companies and its employees from public information including company websites, business and social media, sector news and industry conferences. We also may have obtained such contact details directly from you or your company if you or your company have previously contacted us using a corporate phone number or corporate email address. Any personal data collected and processed for our business-to-business marketing practice as detailed herein is done so pursuant to our legitimate interest to market our services to you.

## Data transfers to recipients outside of the European Economic Area

We may transfer your Personal Data to affiliated companies or third-party service providers located outside the European Economic Area ("EEA") in jurisdictions that are not subject to an adequacy decision by the EU Commission finding them to provide an adequate level of protection of Personal Data, i.e. a level of protection of fundamental rights and freedoms that is essentially equivalent to that guaranteed within the EU.

However, to ensure an adequate level of protection for your personal data, we will comply, and require the compliance of our third-party providers, with one of the transfer mechanisms specified in the GDPR and approved by the EU Commission.

### How long we keep your Personal Data

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### Your rights regarding the processing of your Personal Data under the GDPR

Citizens and residents of the European Union and UK have the following rights under the GDPR:

- the right to be informed of the details of the processing of their Personal Data
- the right to request access to or copies of the Personal Data that we process
- the right to rectification of any inaccuracies in their Personal Data
- the right to erasure of their Personal Data subject to legal and other obligations
- the right to restrict processing subject to legal and other obligations
- the right to object to processing subject to legal and other obligations
- the right to lodge a complaint with a supervisory authority(The Information Commissioner's Office)
- the right to data portability, subject to reasonable limitations
- rights in relation to automated decision making and profiling

If you wish to exercise any of these rights, please select this [LINK](#) and complete the online form. We may also need to ask you for further information to verify your identity before we can respond to any request.

### Your provision of Personal Data to us

Your use of our websites and your provision of Personal Data to us in the process is purely voluntary on your part. Subject to your sole discretion, you can, at any point, stop using the website or, where applicable, opt out of certain data processing operations while on the website as described in this notice. An exception applies if and to the extent that you want to enter into or perform a Contract with us on or through the website. In this event, providing us with your related Personal Data is necessary for us to be able to enter into the contract with or provide any contractual services to you.

### How we protect your personal data

We are committed to ensuring the security of your Personal Data. We take appropriate commercially reasonable technical, physical and organisational measures to prevent unauthorised or unlawful processing of your personal data or accidental loss or destruction of your Personal Data.

### Changes to this notice

Company reserves the right in its sole discretion to amend this Privacy Notice from time to time. In this event, we will post the revised notice on the website. We encourage you to periodically view this notice so that you remain informed as to how we are protecting users' Personal Data and about what cookies are used on the website. We may, where necessary, notify users of any modified version of this notice that might materially affect the way we use, disclose or otherwise process users' Personal Data or otherwise affect their privacy rights. We may do this by posting an update on the website which users will see at their next visit.

### [Contact us or our Information Compliance Manager](#)

Questions, comments or requests regarding this Privacy Notice should be made by completing the form available via this [LINK](#) or by post to: FAO Data Protection, Advantage Smollan Limited, 650 Eskdale Road, Winnersh Triangle, RG41 5TS.

### [The right to lodge a complaint with a supervisory authority](#)

You have the right to complain to the Information Commissioners Office by;

- Helpline – Call them on 0303 123 1113, Monday to Friday between 9am and 5pm.
- Live chat – Have an online conversation with someone at the ICO at <https://ico.org.uk/global/contact-us/live-chat/>.
- Email – Use the form at <https://ico.org.uk/global/contact-us/email/>