

AVIRE

WEBSITE PRIVACY POLICY

Introduction

This privacy policy explains how we, AVIRE Ltd, collect, use, and protect your personal information when you use our website. We are committed to ensuring that your privacy is protected, and we will only use your personal information in accordance with this privacy policy. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://www.avire-global.com/> you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation (GDPR) and its UK implementation, the Data Protection Act 2018, the data controller is AVIRE Ltd, Unit 1, The Switchback, Gardener Road, Maidenhead, SL6 7RJ.

Definitions of terms

The data protection declaration of AVIRE Ltd is based on the terms used in the GDPR. In order to achieve a better understanding of this data protection declaration, we would like to explain the terms used to the public, interested parties and our customers.

We use the following terms, among others, in this data protection declaration:

- **Personal data.** Personal data is any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Affected person.** Affected person is any identified or identifiable natural person whose personal data is processed by the person responsible for processing.
- **Processing.** Processing is any process carried out with or without the help of automated processes or any such series of processes in connection with personal data such as the collection, recording, organisation, ordering, storage, adaptation or change, reading, querying, use, disclosure through transmission, distribution or any other form of provision, comparison or linking, restriction, deletion or destruction.
- **Restriction of processing.** Restriction of processing is the marking of stored personal data with the aim of restricting their future processing.
- **Profiling.** Profiling is any type of automated processing of personal data that consists of using this personal data to evaluate certain personal aspects relating to a natural person, in particular aspects relating to work performance, economic situation, health, personal. To analyse or predict the preferences, interests, reliability, behaviour, whereabouts or relocation of this natural person.
- **Pseudonymisation.** Pseudonymisation is the processing of personal data in a way in which the personal data can no longer be assigned to a specific data subject without the use of additional information, provided that this additional information is stored separately and is subject to technical and organisational measures that ensure that the personal data cannot be assigned to an identified or identifiable natural person.
- **Responsible person.** The responsible person or person responsible for processing is the natural or legal person, authority, institution or other body that alone or jointly with others decides on the purposes and means of processing personal data.

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- **Processor.** A processor is a natural or legal person, authority, institution or other body that processes personal data on behalf of the person responsible.
- **Recipient.** A recipient is a natural or legal person, authority, institution or other body to which personal data is disclosed, regardless of whether it is a third party or not.
- **Third party.** A third party is a natural or legal person, public authority, agency or body other than the data subject, the person responsible, the processor and the persons who are authorised to process the personal data under the direct responsibility of the person responsible or the processor.
- **Consent.** Consent is any declaration of intent voluntarily given by the data subject in an informed manner and unequivocally in the form of a declaration or other unequivocal affirmative action with which the data subject indicates that they consent to the processing of their personal data.

What information we collect

We may collect the following information when you use our website:

- **Information you give us.** This is information about you that you give us by filling in forms on our site www.avire-global.com or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph.
- **Information we collect about you.** Regarding each of your visits to our site we will automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform,
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.
- **Information we receive from other sources.** This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

How we use your information

We may use your information for the following purposes:

- To process your orders and payments
- To provide customer support and respond to your inquiries

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- To improve our website and services
- To send you marketing communications about our products and services, if you have opted-in to receive them
- To comply with our legal obligations.

Our legal basis for processing your information

We must have a lawful basis for processing your information; this will vary depending on the circumstances of how and why we have your information. We rely on:

- Your consent being given for one or more specific purposes
- The processing being necessary performance of a contract between us
- The processing being necessary to comply with a legal obligation e.g. providing information to governmental or regulatory bodies
- The processing being necessary for our legitimate interests e.g. to send our business customers and contacts information about our products and services, to make our services more efficient, to develop our product offerings or to carry out fraud prevention activities.

We do not process any special categories of information i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, processing of biometric data for the purpose of uniquely identifying individuals, health data, or data concerning your sex life or sexual orientation, but if we do we must have a further lawful basis for the processing and tell you what that basis is.

How we protect your information

We are committed to protecting your personal information and have implemented appropriate technical and organisational measures to ensure its security. We also restrict access to your information to those employees who need it to perform their job duties.

Cookies

The AVIRE website and HUB platform use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to use the site and HUB, you are agreeing to our use of cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical / performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our 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).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

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You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Except for essential cookies, all cookies will expire after 12 months.

Analysis tools

The tracking measures listed below and used by us are carried out on the basis of Article 6(1) of the GDPR. With the tracking measures used, we want to ensure a needs-based design and continuous optimisation of our website. On the other hand, we use tracking measures to statistically record the use of our website and to evaluate it for you in order to optimise our offer. These interests are to be regarded as legitimate within the meaning of the aforementioned regulation.

The respective data processing purposes and data categories can be found in the corresponding tracking tools.

• Google Analytics

We use Google Analytics, a web analysis service from Google Inc. <https://about.google/intl/en/> of 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (Google). In this context, pseudonymised usage profiles are created and cookies are used. The information generated by the cookie about your use of this website such as

- browser type / version,
- the operating system used,
- Referrer URL (the previously visited page),
- Host name of the accessing computer (IP address),
- time of the server request,

are transmitted to and stored by Google on servers in the United States. The information is used to evaluate the use of the website, to compile reports on website activity and to provide other services related to website and internet usage for the purposes of market research and needs-based design of this website. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf of us. Under no circumstances will your IP address be merged with other Google data. The IP addresses are anonymised so that an assignment is not possible (IP masking).

You can prevent the installation of cookies by setting the browser software accordingly; however, we would like to point out that in this case not all functions of this website can be used to their full extent.

Further information on data protection in connection with Google Analytics can be found in the Google Analytics Help <https://support.google.com/analytics/answer/6004245?hl=en>.

• Google Ads Conversion Tracking

We also use Google Conversion Tracking to statistically record the use of our website and to evaluate it for the purpose of optimising our website. Google Ads will set a cookie on your computer if you have reached our website via a Google ad.

These cookies lose their validity after 30 days and are not used for personal identification. If the user visits certain pages of the Google Ads customer's website and the cookie has not yet expired, Google and the customer can see that the user clicked on the ad and was redirected to this page.

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Every Google Ads customer receives a different cookie. Cookies cannot therefore be tracked via the websites of Google Ads customers. The information obtained using the conversion cookie is used to create conversion statistics for Google Ads customers who have opted for conversion tracking. The Google Ads customers find out the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they do not receive any information with which users can be personally identified.

If you do not want to take part in the tracking process, you can also refuse the setting of a cookie required for this – for example via a browser setting that generally deactivates the automatic setting of cookies. You can also deactivate cookies for conversion tracking by setting your browser so that cookies from the domain “www.googleadservices.com” are blocked. You can find Google’s data protection information on conversion tracking here <https://services.google.com/sitestats/en.html>.

- **Google Tag Manager**

Our website uses Google Tag Manager. Using Google Tag Manager, website tags can be managed on one platform. The Google Tag Manager tool itself is a cookie-free domain. This means no cookies are placed and no personal data is collected. The tool triggers other tags, which in turn may collect data. Google Tag Manager does not access these data. If a deactivation has taken place, whether on a domain or cookie level, this will apply for all tracking tags, as long as these are implemented with Google Tag Manager.

In effect, this means that the Google Tag Manager does not collect data. Instead, it simply deploys other tools which collect data as required.

- **Google reCAPTCHA**

We use Google reCAPTCHA to determine whether it is a human being or a computer that has made a specific entry into our registration form. Google is the provider. Google uses the following data to check whether you are a human or a computer:

- IP address of your device,
- the website of ours you are visiting and in which the Captcha is embedded,
- the date and duration of your visit,
- the identification data on the browser used and operating system type,
- the Google account, if you are signed into Google,
- mouse movements over the reCAPTCHA areas.

Legal foundation for the data processing described is Article 6(1) of the GDPR. We have a prevailing legitimate interest in using this tool to ensure the security of our websites, to protect ourselves from automated entries (such as bot attacks) and to ensure that it is used exclusively for private, non-commercial purposes by human users. The benefit to you is that with improved security, we can better guarantee the provision of our website.

Further information on Google reCAPTCHA and Google's privacy statement can be found here: <https://www.google.com/intl/de/policies/privacy> and <https://www.google.com/recaptcha/intro/android.html>.

- **Hotjar**

This session cookie is set to let Hotjar know whether that visitor is included in the sample which is used to generate funnels.

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You can find more information about the handling of user data in Hotjar's data privacy statement: <https://www.hotjar.com/legal/policies/privacy/>

Other Tools

• YouTube videos

Our website uses plug-ins of YouTube, a website operated by Google. The operator of the webpages is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA (YouTube). If you visit one of our webpages equipped with a YouTube plugin, a connection with the YouTube servers is established. In this case, which of our webpages you have visited is communicated to the YouTube server.

If you are logged into your YouTube account, you enable YouTube to directly allocate your browsing habits to your personal profile. You can prevent this by logging out of your YouTube account.

We use YouTube videos in particular to present our company in a way that is most appealing to you and to give you a comprehensive overview of our products and services. Often, a short descriptive video says more than a long text.

You can find more information about the handling of user data in YouTube's data privacy statement at: <https://www.google.com/intl/en/policies/privacy>

• Salesforce and Pardot

We use Salesforce and Salesforce Pardot to build, manage and organise customer relationships which may include collecting and storing your personal data.

You can find more information about the handling of user data in Salesforce's data privacy statement at: https://www.salesforce.com/company/privacy/full_privacy/

Social Media Networks

On our website you will find links to the social media services Facebook, LinkedIn, YouTube. Links to websites of the social media services can be recognised by the company's logo. These are not social plugins that allow the provider to start recording data as soon as a page is opened. We deliberately decided against this in order to provide the most appealing and privacy-enhancing website design for you. If you follow these links, you will reach the AVIRE company page on the respective social media service. When you click on a link to a social media service, a connection to the servers of the social media service is established. This tells the servers of the social media service that you have visited our website. In addition, further data is transmitted to the provider of the social media service. These are, for example:

- Address of the website where the activated link is found
- Date and time that the website was accessed or the link was activated
- Information about the browser and operating system used
- IP address.

If you are already logged in to the corresponding social media service at the time the link is activated, the social media service provider may be able to determine your username and possibly even your real name from the data transmitted and assign this information to your personal user account with the social media service. The provider can then see that you are interested in AVIRE, for example, when you click on the link. You can prevent this information being assigned to your personal user account by logging out of your user account beforehand.

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The servers of the social media services are in the USA and other countries outside of the UK and the European Union. The data can therefore also be processed by the provider of the social media service in countries outside the UK and the European Union. Companies in these countries are governed by data protection laws which generally do not protect personal data to the same extent as is the case in the UK and the EU.

We have no control over the extent, type and purpose of the data processing carried out by the provider of the social media service. Further information on the use of your data by the social media services integrated on our website can be found in the privacy policy of the respective social media service.

Sharing your information

We may share your personal information with third parties for the following purposes:

- To process your orders and payments
- To provide customer support and respond to your inquiries
- To comply with our legal obligations
- To send you marketing communications about our products and services, if you have opted-in to receive them.

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Section 1159 of the UK Companies Act 2006.
- Selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with [them or] you;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site;
 - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If AVIRE Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [Terms of Use](#) or [Conditions of Sale](#) and other agreements; or to protect the rights, property, or safety of AVIRE Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data

The data that we collect from you will be transferred to, and stored at, a destination inside the UK and European Economic Area (EEA). It will also be processed by staff operating inside the UK and EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your

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payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long we keep your personal data

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. tax/accounting purposes).

Your rights

You have the following rights with respect to your personal information:

- The right to be informed - to know what happens to your information
- The right of access - you can make a Subject Access Request (SAR) to obtain copies of your data
- The right to rectification – your data should be kept accurately and you can ask us to correct it if necessary
- The right to erasure - to have your data deleted or to be forgotten
- The right to restrict processing - if you believe the data is inaccurate or you require it for legal claims, or if you believe the processing is unlawful or you wish to challenge our legitimate interests
- The right to data portability - to transfer your data from one supplier to another
- The right to object - to stop your data from being processed
- Rights in relation to automated decision making and profiling – the right not to be profiled or to have a human make automated decisions about you.

If you wish to exercise any of these rights, please contact us at info@avire-global.com. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Changes to this policy

We may update this privacy policy from time to time. The latest version of the policy will always be available on our website. We encourage you to review this policy periodically to stay informed about how we are protecting your personal information.

Contact us

If you have any questions or concerns about this privacy policy, please contact us at info@avire-global.com. You can also complain to the ICO if you are unhappy with how we have used your data.

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Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113 / ICO website: <https://www.ico.org.uk>