

# Privacy Notice - arbnco website and suppliers / contractors

**DOCUMENT NO: AMSPOL011** 

This privacy notice is to explain to you the reasons why we may hold and use your personal data and explain your rights under the current data protection laws.

It applies to the information you provide when using any of our websites, including our mobile apps and any other services we offer (for example, webinars or events). These will be referred to as 'services' in this notice.

Where 'personal data' is used this means identifiable information about you, such as your name, email address, payment details, IP address, support queries and so on. Any data that does not uniquely identify you is not covered by this Privacy Policy and the <u>terms and conditions of use</u> of the website apply instead.

If we need to modify this notice and that change is significant, we will let you know, usually by email.

### What do we mean by "we"?

When we say "we", "us" or "our" that means arbnco Ltd (company number SC423816) headquartered in Glasgow, UK. arbnco develops disruptive proprietary technology solutions for the built environment through collaboration with world leading research bodies.

We are registered as a data controller with the UK Information Commissioner and our registered number is ZA416552.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 0131 222 3239 or info@rgdp.co.uk

This website privacy notice explains how we collect and use personal information about website users and contractors and suppliers. A separate Privacy Notice is issued to our staff.

We take the issue of security and data protection very seriously, including compliance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

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# How we collect your data

#### Website Users:

When you use any of our services, we may collect personal data about you. This can include:

- Information you provide to us, such as providing contact details when accessing our content, when completing a contact us form, when you join us on social media or participate in training and events.
- Information we collect automatically, such as your IP address and website click history. This is likely to be collected via a "cookie", which is a small text file that's placed on your computer or mobile device. A cookie helps analyse web traffic or lets website operators know when you visit a particular site to tailor its operations to your preferences.
- Some cookies are necessary in order to make the website function, such as using
  your location to direct you to the correct geographical instance of our website.
  These cookies are enabled by default and cannot be switched off. Cookies for
  analytics or marketing purposes, such as Google Analytics or basket monitoring, will
  be disabled by default but can be enabled using the widget that appears when the
  website loads.
- Information we get from third parties, such as information in the public domain or which we receive from trusted marketing and research partners. We use this information to supplement the personal data we already hold about you to improve the services we offer.

### Suppliers and Contractors:

In order for us to engage with you as a supplier we need to gather personal data about you. This can include:

- Information you provide to us, such as on the New Supplier form or items we request as part of our due diligence.
- Information from the public domain, such as Companies House information and news articles.
- When you visit our premises your image may be captured by our CCTV cameras. Notices are available where the cameras are in operation.

# What personal data will we process?

#### Website Users:

We may collect:

- Name
- Email address
- Phone numbers
- IP address

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# Suppliers and Contractors:

We may collect:

- Name
- Contact details, including phone numbers, addresses and email addresses
- References
- Bank Details
- CCTV imagery
- Telephone call recordings

We will use this information to potentially enter into or enter into a contract with you and for the administration of our organisation.

# We will only process your personal data if:

- we have an existing contract with you, or
- we have legitimate interests and they are not overridden by your rights, or
- we have to fulfil a legal obligation, or
- we have your consent to do so.

# What we do with your data

#### Website Users:

We will use your personal data to provide you with our services, and we may also use your data for other purposes, such as:

- to communicate with you, by providing you with requested information or operational updates (for example, changes to the Privacy Notice, changes to any of our terms and conditions).
- to protect our services against malicious or unauthorised activity in accordance with the.
- to improve the services we provide, by monitoring and analysing end user usage.
- to analyse and report, by aggregating and reporting on anonymised data which we may share publicly or with third parties.
- to market to you, by sending you details of our services that may be of interest to you, in accordance with your marketing preferences. You have the right to opt-out of direct marketing at any time by contacting <a href="marketing-action-com">contact@arbnco.com</a>.

# Suppliers and Contractors:

We only use your personal data to administer the supplier contract you have with us.

This can include:

- processing your business contact and business bank details to ensure you get paid.
- making decisions about your suitability to supply us with goods and services.

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• sharing your data with Scottish Enterprise to help us apply for grant funding. If your company is trading as a Sole Trader, the above information could be your own personal details.

# Who do we share your personal information with?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, government agencies and regulators and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

### We may also disclose your personal data:

- with your consent;
- to the extent that we are required to do so by law;
- to protect the rights, property and safety of us, our customers, users of our websites and other persons;
- in connection with any ongoing or prospective legal proceedings;
- if we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, and other regulatory body involved in any complaint, whether investigating the complaint or otherwise;
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
- to another organisation if we enter into a joint venture or merge with another organisations.

# What are the legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests, including CCTV imagery
- legal obligation

### Where we store your data

When we process or share data it may be moved to a country other than the one you live in, including outside of the European Economic Area (EEA). Some of these countries may have local laws equivalent to GDPR, but where data is transferred to another country, we put safeguards in place to ensure your personal data is kept secure at all times.

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# How long we store your data

We keep data about you during the period of time you are an existing customer of ours. After this relationship has ended, we keep financial information for 6 years in order to comply with our legal obligations.

We keep contact and order history information for 10 years after the end of our relationship, so we can answer any future queries and maintain a relationship with you should you become a customer again.

Should you opt-out of receiving marketing communications from us, we will retain your contact details and a note that you do not wish to receive marketing in the future, in accordance with our Retention Schedule.

#### Links

Our website contains links to other websites. Please be aware that we are not responsible for the privacy practices of other websites, nor the content of such websites. We encourage our users to be aware when they leave our website and to read the privacy statements external sites that collect personal data.

# Your rights

Your personal data belongs to you and you have certain rights which you can choose to exercise. You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- where you have entered your personal data onto our website you can request this in a machine-readable portable format (e.g. CSV);
- require us to correct any inaccuracies in your information;
- in certain situations, make a request to us to delete your personal data;
- request we restrict processing your personal data;
- withdraw your consent in situations where you have provided it to us
- object to receiving any marketing communications from us, or where we are processing your personal data on the basis of legitimate interests, and;
- to be informed of any automated decisions made in relation to you.

If you wish to exercise any of the above Rights, please send an email to <u>info@arbnco.com</u> and we will get back to you within 30 days.

If you are not happy with our response, you have the right to complain to your local data protection authority who will advise you how to submit a complaint.

For the UK, the local data protection authority is the Information Commissioner: Telephone: 0303 123 1113 or Online: Make a complaint | ICO

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Approved:

Maurien Eignerner

05/09/2023 Date:

Review: 01/04/2024

Maureen Eisbrenner Issue No: 03

Co-Founder & CEO