

## 1. Introduction

This is the privacy policy of Nviron Limited ("Nviron", "us" or "we"), which applies to all personal data we process, except personal data relating to any person in connection with their employment or engagement by Nviron (which is covered by a separate privacy policy).

Privacy policies are also sometimes referred to as a 'privacy notices' or 'fair processing notices'.

We are committed to protecting and respecting your privacy. This policy explains the types of personal data we collect, how we use that information, who we share it with, how we protect that information, and your legal rights in relation to your personal data.

## 2. About this policy

This policy governs the collection and use of personal data by Nviron. This includes any personal data you may provide as part of any contract you enter into with us, any personal data you provide (or is available to us) through your use of our website and any personal data which we may obtain from other sources.

When we refer to personal data in this policy, this means any information about an individual from which that person can be identified. More details about this are set out in section 6.

It is important that you read this policy together with any other privacy notice (or 'fair processing' notice) we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This policy supplements any such other notices and is not intended to override them.

We have appointed a person who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the Company Secretary using the contact details set out in section 15.

This version of the privacy policy is effective as of **11 October 2023**.

## 3. Who we are

For the purpose of applicable data protection laws, the controller of your personal data is Nviron Limited, whose registered office is at Unit 6 Abbots Park, Monks Way, Preston Brook, Runcorn, England, WA7 3GH. For more information about Nviron please see: [www.nviron.co.uk](http://www.nviron.co.uk).

## 4. Keeping your information up to date

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes at any time, by contacting the Company Secretary using the contact details set out in section 15.

## 5. Changes to this policy

We reserve the right to amend this policy at our sole discretion, without prior notice to you. We will notify you of any such changes (including when they will take effect). Your continued use of our website or our services following the posting of changes to these terms means that you agree to those changes (but this does not affect your rights set out in section 14).

## 6. Information covered by this policy

This policy covers all personal data collected and used by Nviron.

In this policy "personal data" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly.

The different types of data we may collect are referred to below. We use these terms elsewhere in this policy to cover the type of personal data referred to:

- **Identity Data** – which may include your first name(s), surname(s), last name(s), title(s) and gender.
- **Contact Data** – which may include your business address, any applicable home address, email

- address(es) and telephone number(s).
- **Contractual Data** – which may include includes details of the existence of (and the terms and conditions applicable to) any contract we have with you and details about the products and services we have contracted to provide to you.
- **Employment Data** - includes details of your job, your position or job title and where you work.
- **Technical Data** – which may include your internet protocol (IP) address, internet browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology used to access our website.
- **Feedback Data** – which may include details of your feedback relating to our website and your responses to any surveys we may issue.
- **Usage Data** – which may include information about how you use our website and services.
- **Marketing Data** - which may include your preferences in receiving marketing information from us and your communication preferences.

## 7. Collection of personal data

We may collect personal data about you from different sources detailed below.

### Information you give us:

Unless expressly stated below, you are not bound by any contractual or statutory obligation to provide personal data to us. However, if you choose to enter into a contract with us (for example, to buy our products or services) then we will need certain information for the purposes of entering into and performing that contract (which may include personal data) and we may not be able to conclude a contract with you without that information.

You may give us information about yourself when you:

- access and browse our website (including when you fill in contact forms or register as a user on our website);
- enter into a contract with us, including ordering our services or buying products from us;
- correspond with us by phone or email or other means (including via any chat facility or contact form on our website or via social media);
- subscribe to our publications;
- request information to be sent to you;
- enter a competition, promotion or survey; and/or
- give us some feedback.

### Information we collect about you:

With regard to each of your visits to our website, we may also use cookies and other technologies to automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer or device to the internet, internet browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology used to access our website; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstreams to, on and from our website, information you viewed or searched for, page response times, download errors, length of visits to certain pages or features of our website, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page.

We collect the above information by using cookies and other similar technologies connected to our website. Our website also use cookies which help us to provide you with a good experience when you access or browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them, please see our cookie policy at: [www.nviron.co.uk/policies](http://www.nviron.co.uk/policies)

### Information we receive and collect from other sources:

We may obtain certain information about you from our suppliers (including hardware or software vendors and partners, marketing agencies and other third party service providers), from government organisations or publicly available sources.

The different kinds of personal data about you which we may collect and process from third parties include:

- Identity Data, Contact Data and Employment Data from our suppliers.
- Identity Data, Contact Data and Employment Data from credit insurers and other credit reference agencies we may use.

- Technical Data and Usage Data from analytics providers (such as Google), search information providers and social media providers.
- Identity Data, Contact Data and Employment Data from government organisations or publicly available sources such as Companies House, HM Revenue & Customs (HMRC), electoral registers and social media providers.

Other information and uses:

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Such aggregated data may be derived from your personal data but is not considered personal data in law (as this data does not directly or indirectly reveal your identity). For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect any such aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

We do not ordinarily collect or require you to provide any sensitive personal data (which the law refers to as ‘Special Categories of Personal Data’ and which we refer to in this policy as ‘Sensitive Data’). This means personal data such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data and information about your criminal convictions or offences. However, it is possible that you may choose to provide Sensitive Data to us (for example, if you choose to tell us that you have health issues).

## 8. How we use your personal data

We will only use your personal data when the law allows us to. Each basis on which we are lawfully permitted to process your personal data is known as the ‘legal basis’ for processing.

The purposes for which we may use your personal data and the types of legal basis that we will rely on to process your personal data are set out in the table below. Note that we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data (as shown in the table). Where more than one is shown, please contact us if you would like details about the specific legal basis we are relying on to process your personal data.

Purpose/Activity	Type of data	Legal basis for processing
To register you as a new customer.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.</li> </ul>
To undertake credit checks in respect of the business you are associated with.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Processing undertaken with your consent.</li> <li>• Necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.</li> </ul>
To administer and supply any products and services you have ordered.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> <li>• Contractual Data</li> </ul>	<ul style="list-style-type: none"> <li>• Processing undertaken with your consent.</li> <li>• Necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.</li> </ul>
To manage our relationship with you, which will include administration of your contract, notifying you about changes to our terms, policies or features of our website and dealing with your enquiries or complaints.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> <li>• Contractual Data</li> <li>• Technical Data</li> <li>• Feedback Data</li> <li>• Usage Data</li> <li>• Marketing Data</li> <li>• Sensitive Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.</li> <li>• Necessary for our legitimate interests (to keep our records updated, to study how customers buy our products or use our services, to manage your account and to deal with your enquiries or complaints).</li> <li>• Necessary to comply with a legal obligation.</li> <li>• Processing undertaken with your consent.</li> </ul>

Purpose/Activity	Type of data	Legal basis for processing
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> <li>• Technical Data</li> <li>• Feedback Data</li> <li>• Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, including our dealings with third party service providers we deal with, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or restructuring exercise).</li> <li>• Necessary to comply with a legal obligation.</li> </ul>
To improve our website, products, services, marketing, customer relationships and experiences.	<ul style="list-style-type: none"> <li>• Technical Data</li> <li>• Feedback Data</li> <li>• Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of customers for our products or services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</li> </ul>
To make suggestions and recommendations to you about products or services that may be of interest to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> <li>• Technical Data</li> <li>• Feedback Data</li> <li>• Marketing Data</li> </ul>	<ul style="list-style-type: none"> <li>• Processing undertaken with your consent.</li> <li>• Necessary for our legitimate interests (to develop our products and services and grow our business).</li> </ul>
To refer you or your business to third party providers of products and services which could be of interest to you or your business.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Processing undertaken with your consent.</li> <li>• Necessary for our legitimate interests (to develop our products and services and grow our business).</li> </ul>
To protect against, or help detect, fraud or criminal activity (including to disclose information to law enforcement agencies) and to manage the safety and security of our website and business and to protect the safety and security of our staff, users of our website or other people.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> <li>• Contractual Data</li> <li>• Technical Data</li> <li>• Feedback Data</li> <li>• Usage Data</li> <li>• Marketing Data</li> <li>• Sensitive Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation.</li> <li>• Necessary for our legitimate interests (to protect against, or help detect, fraud or criminal activity and to manage the safety and security of our business, staff and third parties).</li> </ul>
To comply with legal requirements (including where you exercise any of your rights referred to in this policy), to exercise our legal rights and to bring or defend legal claims.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> <li>• Contractual Data</li> <li>• Technical Data</li> <li>• Feedback Data</li> <li>• Usage Data</li> <li>• Marketing Data</li> <li>• Sensitive Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation.</li> <li>• Necessary for our legitimate interests to exercise our legal rights and to bring or defend legal claims.</li> </ul>

We will only use your personal data for the purposes shown above. If we need to use your personal data for a different purpose, we will update this policy and notify you of the change before starting any such new processing.

Please note that in some circumstances we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 9. Transfers of personal data

We may have to share your personal data with the parties set out below for the purposes shown:

any member of our group of companies, including subsidiaries and holding companies (acting as our data processors), in order to enable you to access the products and services we provide, to provide you with customer support and conduct the other activities described in this policy;

your banks, customers or suppliers, for the purposes of seeking bank and/or trade references relating to your business;

third parties such as:

- our suppliers of equipment and related logistical services (acting as our data processors) for the purposes of delivering and collecting equipment and assisting with installation and repair of equipment;
- service providers (acting as our data processors) for the purposes of providing us with services relating to IT, hosting and other infrastructure and IT system administration, market research, debt collection, marketing, advertising, communications, training, payment processing and data cleansing and processing services;
  - professional advisers including lawyers, bankers, accountants, auditors and insurers for the purposes of providing legal, banking, accounting, auditing and insurance services to us (usually such advisors will act as our data processors but in some instances they may become data controllers of the personal data we supply to them);
  - HM Revenue & Customs, other regulators, other regulators and government authorities, for purposes required by law; and
  - the police and fraud prevention agencies, for the purposes of crime detection and prevention;
- third party service providers, for the purposes of undertaking or administering surveys, competitions or prize draws;
- third party providers of products and services which could be of interest to your business (acting as our data processors), for the purposes of them assessing whether they could offer your business any products or services and (if applicable) the potential terms on which they could offer them (which will typically involve providing them with Identity Data, Contact Data and Employment Data);
- third party providers of products and services which could be of interest to your business (who will become data controllers of the personal data we provide to them), where you have consented to us passing your personal data to them, for the purposes of them contacting you regarding their products and services (which will typically involve providing them with Identity Data, Contact Data and Employment Data);
- third parties which introduce you to us, including marketing agencies and other service providers, for the purposes of administering, monitoring and fulfilling the performance of their contracts with your business and/or their contracts with us (which may include informing them whether or not we have entered into a contract with your business); and
- providers of other services that may be provided to your business by companies we work with, for the purposes of administering, monitoring and fulfilling the performance of their contracts with your business and/or their contracts with us (which may include informing them whether or not we have entered into a contract with your business, providing them with information relating to any complaints, providing them with information about the operation and status of your business's contract with us or with them.

We may also disclose your personal data to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if any member of our group or substantially all of its assets are acquired by a third party, in which case your personal data may be one of the transferred assets and disclosed to them accordingly;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- in order to enforce our rights or defend claims against us, including to enforce or rely on the terms and conditions of contracts we enter into, where disclosure of your personal data is relevant for such purposes; and
- in order to protect or enforce the rights, property or safety of ours or any member of our group or any staff employed by us or any member of our group, where disclosure of your personal data is relevant for such purposes.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Our third-party service providers (to the extent they are acting as our data processors) are contractually bound to use personal data only to perform the services that we have engaged them to provide and they are only permitted to process your personal data in accordance with our instructions.

Please note that some of the third parties we share your personal data which are based outside the United Kingdom (UK), so their processing of your personal data will involve a transfer of data outside the UK. Please see section 10 about data being processed outside of the UK.

## 10. Where we store your data

Usually your personal data will be stored in the United Kingdom (UK). However, some of our external third-party service providers are based outside the UK, so your personal data may be transferred to a destination

outside of the UK. This means it may also be stored and processed at a destination outside of the UK, including by staff operating outside the UK who work for one of our service providers.

Whenever we transfer your personal data to our service providers outside of the UK, we ensure a similar degree of protection is afforded to it as applies within the UK, by ensuring that certain minimum legal safeguards are met or implemented. We take all steps that are mandatory or reasonably necessary to ensure that your personal data is treated securely and in accordance with applicable data protection laws.

Please contact us if you want further information about the circumstances in which we transfer your personal data out of the UK or the safeguards we use.

## 11. How long we store your data for

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, as well as the applicable legal requirements.

Details of the periods for which we retain different aspects of your personal data are set out in our Data Retention Policy, at [www.nviron.co.uk/policies](http://www.nviron.co.uk/policies)

In some circumstances, you can ask us to delete your data. Please see section 14 regarding 'Your Rights' for further information.

## 12. Security of your personal data

We use administrative, technical, and physical measures to safeguard personal data against loss, theft and unauthorised uses, access or modifications. Our staff and our third-party service providers are under a duty to process your personal data only in accordance with our instructions and they are subject to a duty of confidentiality regarding your personal data.

We have put in place procedures to deal with any suspected personal data breach. We will notify you and any applicable regulator of any breach where we are legally required to do so.

## 13. Third party websites and apps

Our website may contain links to and from third party websites and we may provide you with details of apps provided by third parties. Please note that if you follow a link to any of these websites or download an app from those third parties, those websites and apps will have their own terms of use and privacy policies and that we do not accept any responsibility or liability for those websites, apps or policies. Please check those terms and policies before you submit any personal data to those websites or apps.

## 14. Your rights

You have the rights set out below with respect to the personal data that we hold about you. To exercise any of these rights, you should contact us by using the contact details set out at the bottom of this policy.

You will not normally have to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity when you seek to exercise any of your rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to help clarify the scope of your request.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### Your right to access the personal data we hold about you

You have the right to ask us whether or not we process your personal data and to request information on the

purposes of data processing as well as confirmation on whether we use your personal data for these purposes only.

In some circumstances, we may not be able to give you access to the personal data we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety).

You also have the right to be informed of the third parties to which we transfer your personal data within the scope of this policy.

#### Your right to have your personal data corrected

You can contact us to have any incomplete or inaccurate personal data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.

#### Your right to erasure of your personal data

You can ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law.

Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, after you make your request.

#### Your right to request restriction of the processing of your personal data

You may ask us to suspend the processing of your personal data:

- if you want us to establish the accuracy of the personal data;
- where our use of the personal data is unlawful but you do not want us to erase it;
- where you need us to hold the personal data even if we no longer require it, as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

We will inform you when you decide to lift any such restriction on processing.

#### Your right to object to us processing your personal data

You have the right to ask us to stop processing your personal data:

- for direct marketing;
- where the processing is based on legitimate interests and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. We will comply with your right to object in these circumstances, unless:
  - we can demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms; or
  - the processing is for the establishment, exercise or defence of legal claims.

Where you no longer wish to be contacted for direct marketing purposes, you can easily unsubscribe from our marketing communications at any time by following the instructions included in those marketing communications.

If you have consented to receive offers or marketing communications directly from any third parties, please note that those third parties (not us) are responsible for taking account of your rights, including your right to opt-out of receiving offers or marketing communications from them.

Where we are relying on your consent to process your personal data, you may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

#### Your right to object to automated decision making

You have the right not to be subject to a decision which is based exclusively on automated processing and produces a legal effect or a similarly significant effect on you. In these circumstances, you are entitled to obtain human intervention, express your point of view and obtain an explanation of the decision and challenge it. However, this right does not apply if the automated decision is necessary for entering into or performance of a contract between you and us, is authorised by law or is based on your explicit consent.

Please note, however, that we do not undertake any such automated processing.

## Your right to have your personal data transmitted to another organisation

Where we process personal data about you which:

- has been provided by you directly to us; and
- is processed by automated means; and
- is processed with your consent or for the performance of a contract with you,

you have the right to ask us to provide you with the personal data we hold about you in a structured, commonly used and machine-readable format or, where technically feasible, to transmit that data to another organisation.

## Making a complaint

You have the right to lodge a complaint to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)), if you believe that we have not complied with applicable data protection laws. You also have a right to claim damages if processing of your personal data violates applicable data protection law.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **15. Contacting us**

If you have any questions about this policy, or if you wish to exercise your rights as referred to in this policy, please contact us by:

- writing to us at:  
Company Secretary  
Nvicon Limited  
Unit 6, Abbots Park  
Monks Way  
Preston Brook  
Runcorn  
Cheshire  
WA7 3GH

or:

emailing our Company Secretary by sending an email to: [admin@nviron.co.uk](mailto:admin@nviron.co.uk).