Annex- Data Protection and Personal Information Handling

206 Jonathan Thu, May 24, 2018 Terms & Conditions 9610

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We wish to be transparent, fair and reasonable in processing and storing personal information, we also abide by all applicable laws.

To promote transparency and fairness we have carried out data impact analysis on our processes known to handle personal data. We will continue to consult and include individuals responsible for handling data with the intention of training them to comply with the Regulation. We aim to inform people how their data is used, gain consent and give choice in their personal data handling. Internet Central restrict the disclosure and processing of Personal Data to the extent necessary to provide and support the services delivered.

Personal data is encrypted and for contractual, insurance and legal requirements may be retained for periods proportionate to those needs and, where requests for data removal are refused, explanation will be given. The Data Protection Officer is the Chairman contactable through the group by phone on 01782 220000 or email to privacy@goodwingroup.com to whom any complaint should be made in the first instance and in the absence of resolution contact should be addressed to the independent Non-Executive Director.

We regard your privacy as important. Information we collect from you, where you choose to provide it to us, enables us to send you information about products and services in which you register an interest. By providing us with your information you consent to us processing it for this purpose. We will not pass information gathered for this purpose on to any third party.

You and IC acknowledge that for the purposes of the Data Protection regulations in current effect both in the EU and UK, you are the Data Controller and IC is the data processor in respect of any Personal Data transferred as part of the services we provide.

IC shall process the Personal Data only in accordance with the your instructions from time to time and shall not process the Personal Data for any purpose other than for performing and maintaining the Services.

Each party warrants to the other that it will process the Personal Data in compliance with all applicable laws, enactments, regulations, orders, standards and other similar instruments.

IC, having regard to the state of technological development and the cost of implementing any measures, shall:

1. take appropriate technical and organisational measures against the unauthorised or unlawful processing of Personal Data and against the accidental loss or destruction of, or damage to, Personal Data to ensure a level of security appropriate to:
    a. the harm that might result from such unauthorised or unlawful processing or accidental loss, destruction or damage; and
    b. the nature of the data to be protected;
2. take reasonable steps to ensure compliance with those measures.

You acknowledge that IC is reliant on you for direction as to the extent to which IC is entitled to use and process the Personal Data. Consequently, IC will not be liable for any claim brought by a Data Subject arising from any action or omission by IC, to the extent that such action or omission resulted directly from your instructions.

Other than as set out below, the Internet Central Limited marketing site does not automatically capture or store personal information, other than information that is automatically logged about visitors and which is used to produce statistics about the use of the site. The following types of information are automatically collected and stored about any visit:

- the Internet domain and Internet Protocol (IP) address from which you access the site;

- the type of Internet browser and the operating system of the computer you use to access the site;
- the date and time you visit the site;
- the pages you visit on the site;
- if you linked to our site from another Web site, the address of that Web site;
- if you linked to the site from a search engine, the address of that search engine and the search term you used.

This information is collected by our web server and is only used for system administration and to provide statistics which we use to evaluate use of our site.

Cookies

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. We do use cookies for tracking information on our web site(s) but these cookies do not collect any personal information. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.
- To optimise our site and locate potential dead links.
- To enable content customisation.
- To allow shopping and account management for customers.

We primarily use cookies from these main systems;

- Google - for web tracking and statistical information on usage of our site and effectiveness with Google Trends.
- Main Web Site(s) - To provide live chat services for our customers and on-line assistance.
- Portal Site - For shopping and account management within the site and on-line assistance.
- Knowledge-base Site - To provide live chat services for our customers and on-line assistance.

- Any other sites owned by IC - will only be to allow the site to function and for on-line assistance.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Continued use of IC sites assumes your understanding and acceptance of our policy.

Web Forms

We may collect and process information that you provide by filling in forms on our site so that you may access 'Industry White papers' and other information from our site, e.g. newsletters and our Business Continuity and Security Library or otherwise use our services, or if you make a general enquiry or ask us to contact you. In each case we will use the personal information you provide to deliver the services you have told us you wish to use. We may also use your data to provide you with information about goods or services which may be of interest to you and we may contact you about these by post or telephone. We may also contact you by electronic means if you have consented to this. If you do not want us to use your data in this way you should tick the relevant box situated on the form on which we collect your data or notify us at any time by contacting us at our registered office.

We may disclose your personal information to 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. We may disclose your personal information to third parties:

- We may need to disclose your personal information to a third party in order to provide new or existing service to you. Where this is the case we will disclose your personal information on a need to know basis in connection with the services to those who have committed themselves to confidentiality, or as required by applicable law.
- 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 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 and

other agreements; or to protect the rights, property, or safety of Internet Central Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Our sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Customer Portal Site

This site uses and requires cookies to track your login and shopping basket. This is also the front end to a database system where you can see and edit your personal information and choose how we use this, for example to keep you informed. In order for IC to provide services we must for legal and regulatory reasons store your personal information.

We will share your personal information with third parties where this is required for the delivery or maintenance of your service.
We will store your email address on a third party email platform for the purpose of account notifications and optionally service notifications.
We will only share your personal information with third parties with whom we have appropriate Personal Information sharing agreements in place.

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