POLICY DOCUMENT

INFORMATION PROTECTION: SENSITIVITY - PUBLIC

ICEFLO Privacy Policy

ICEFLO

COMPANY
ICEFLO Limited

VERSION
v1d0

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2. Purpose of the Policy

The purpose of this policy is to define how we approach your privacy when using our website.

ICEFLO Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, https://www.iceflo.com/ ("Our Site"). We will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy. However, if you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

3. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 14, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"Personal Data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate, the definitions provided in the EU Regulation 2016/679- the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means ICEFLO Limited, a limited company registered in Scotland under company number SC622689, whose registered address is St Dunstans House, High Street, Melrose, United Kingdom, TD6 9RU:

4. Information About Us

Our Site is owned and operated by ICEFLO Limited, a limited company registered in Scotland under company number SC622689, whose registered address is St Dunstans House, High Street, Melrose, United Kingdom, TD6 9RU, and whose main trading address is St Dunstans House, High Street, Melrose, United Kingdom, TD6 9RU.

Our VAT number is 323 4421 39

> Our Data Compliance Manager is Andy Smith, and can be contacted by email at legals@iceflo.com, by telephone on +44 (0)1835 822 916, or by post at ICEFLO Limited, St Dunstans House, High Street, Melrose, United Kingdom, TD6 9RU

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

5. Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you (see section 13);
- The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 15);
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 15);
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 15 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

6. What Data Do We Collect?

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data (please also see Our Cookies policy and similar technologies):

- Name
- Business/company name
- Job title
- Contact information such as email addresses and telephone numbers
- Demographic information such as post code, preferences and interests
- Web browser type and version
- Operating system
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to

7. How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 8, below

- Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes
- Providing and managing your access to Our Site
- Personalising and tailoring your experience on Our Site
- Supplying Our products AND/OR services to you (please note that We require your personal data in order to enter into a contract with you)
- Personalising and tailoring Our products AND/OR services for you
- Replying to emails from you
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by unsubscribing or setting your email preferences within the email footer
- Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience

- With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email AND/OR telephone with information, news and offers on Our products AND/OR We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases)
- Until opt out has been received

8. How and Where Do We Store Your Data?

We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it. Your data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

9. Do We Share Your Data?

We will not share any of your data with any third parties for any purposes.

In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, court order, or a governmental authority.

We may sometimes contract with third parties to supply [products and] services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data

and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

In certain circumstances, we may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

10. What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us. In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

11. How Can You Control Your Data?

In addition to your rights under the GDPR, set out in section 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Your Right to Withhold Information

You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data. You may restrict Our use of Cookies – see our Cookies Policy.

13. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable, and We will provide any and all information in response to your request free of charge. Please contact Us for more details at legals@iceflo.com, or using the contact details below in section 15

14. Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products AND services. In addition, Our Site uses analytics services provided by Google Analytics, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site.

A cookie is a small file on your computer which stores certain information about your online browsing. Cookies help us recognise you as a prior visitor, to personalise your browsing and to track your interests so we can improve our site for your benefit. We do not store any personal data about you using cookies. Your browser can be set to not accept cookies; in which case you may still use our site.

15. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at legals@iceflo.com, by telephone on +44 (0)1835 822 916 or by post at ICEFLO Limited, St Dunstans House, High Street, Melrose, United Kingdom, TD6 9RU. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

16. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

17. Document Control

Version:	v1d0
Date of Issue:	15/08/2023
Review Date:	20/10/2026
Review Frequency:	Annually
Date of Next Review	20/10/2027
Document Owner:	Andy Smith

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