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Registered in England No. 2215909

## Privacy Policy

At Pozzani we are committed to maintaining a trusted relationship with our visitors and customers, fully appreciating that nobody wants to receive junk mail or feel harassed over a water filter. To be clear our business is water filters, nothing else, so you can be assured that your personal data will never be sold, rented, transferred or otherwise given to a third-party - We are people here too, and we don't like it when it happens to us, so we won't do it to you!

This document contains lots of important information about what data we store about you, why we store it, your rights and our obligations. It's not the most excited read, granted, and it certainly won't make the bestseller list on Amazon, however, we did write it ourselves, without lawyers, so at least it is from 'us' to 'you'.

## Website

### Cookies

When you click on products on our site, especially if you add them to your basket, we need to place a small file on your computer called a "cookie". This contains no personally identifiable information about you, simply a reference to a 'session' which is a random string of numbers identifying a particular basket. When you move from one website to another and back again, this is how your computer remembers what you already had in your cart.

We can also use this cookie to see a path of clicks through our website, which is necessary for us to be able to deliver a you a high quality shopping experience, allowing us to continually improve our functionality.

Further uses for cookies include:

- Tracking if you are logged in or not
- Providing goods and services for purchase
- To make personalised changes to the site based on your history
- In collecting data for quality control purposes
- In collecting data for store performance monitoring

By using our website you consent to us using cookies for the purposes described. If you do not wish to give such consent you should disable cookies in your browser or discontinue use of the website.

## **Google Analytics**

When you visit [www.pozzani.co.uk](http://www.pozzani.co.uk) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone - We are unable to trace a series of clicks or user actions to a specific person or information identifying a specific person.

We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website

## **Mailing Lists**

As part of the registration and shopping processes you may be asked if you wish to receive two types of correspondence from us:

### **Type 1**

News about the product you have purchased from us, reminders when it is due for renewal and any specific information regarding updates or improvements.

### **Type 2**

News about non-related products/services, cross marketed services or other products.

In plain speak, if you purchase a filter for your fridge, under Type 1 we might email you in six months to say your specific filter requires changing. However, if we wanted to email you to tell you we had a new type of filter for a coffee machine, this would be classified as Type 2.

Under the new GDPR Legislation 2018, we manage emails sent under Type 1 as 'soft opt-in' with a pre-ticked box, on the basis of Legitimate Interest (see our Legitimate Interest Statement at <http://www.pozzani.co.uk/privacy/lia.html>). Type 2 emails require a positive opt-in, and you will have to tick a box during the registration or checkout process to give your consent to these emails being sent.

Emails may be sent via a third party provider. At the time of writing this is the company “Sendinblue”. Their privacy statement, which is GDPR compliant, can be found at:

<https://www.sendinblue.com/legal/privacypolicy/>

## **Monitoring**

“SendinBlue” and other email providers utilise technology which enables us to track if an email has been received or whether links within an email have been clicked. This is used to track the performance of campaigns and to allow us to improve our emails to make them more relevant to the user.

## **Opt Out**

At any point, at any time, for any reason you may choose to opt out of both Type 1 and Type 2 emails. We won't ask you questions why, we won't ask you to change your mind, we will just stop sending your correspondence in future. All emails sent which fall into either of the classifications above feature an Opt-Out link, which is fully automated, and by clicking this you will essentially not hear from us again unless there is a clear urgent matter which justifies the intrusion. Such events may include, but are not limited to:

1. Product recalls, safety notices and warnings
2. Changes to instructions of use which may affect the product performance
3. Fraud, attempted fraud or another legal matter
4. Changes to warranties or guarantees
5. Notices related to billing for subscription based customers

## **Regular Emails**

Emailing us does not give us the right to put your name on a mailing list - You can send an enquiry without fear of receiving unsolicited email in response. Certain emails are necessary and implied consent is assumed in relation to:

1. Order processing, confirmations, delivery notice
2. Problems with payment, billing or other post-sale issue

## **What data do we store**

When you purchase a product from us we will record your name, address, email, telephone and other contact information, along with the financial details of the

transaction (product, quantities, amounts) in accordance with our accounting obligations under UK laws and in order to process your order swiftly and make a delivery.

Where you email us with a question and are an existing customer, we may record the specific details of your enquiry against your customer record with a view to allowing us to build a case history of the customer or the system to further improve technical guidance in future.

Where you email us with a general question, customer or not, the email will be retained in order to ensure we can document a trail of correspondence if ever asked to do so. As our products are technical in nature and many emails constitute technical advice, it is important we can show what has been told to you, when it has been told and how its been told. For the same reason we may also hold details about quotations, job planning, bespoke drawings and any other element in planning or advising a customer.

Where you have given us an instruction to retain your payment information for future charging, we may store your details securely for the purposes of reprocessing payment.

If you visit us we have CCTV systems both internally and externally which record to digital media for the purposes of staff security and crime prevention. CCTV videos are typically stored for 28 days unless the local authorities specifically request a piece of video to be retained for an investigation related to the purposes described above.

### **Third Party Usage**

Your data will never be given, sold or rented to a third-party company for the purposes of them marketing to you. Occasionally it is necessary to divulge some data to service companies, such as SendinBlue (described above) in order for us to carry out our day-to-day running of the company, however, in all such events we will ensure each third-party contractor we engage has a suitable privacy policy that is GDPR compliant and a suitable data destruction policy. At the time of writing, other entities which may hold your data on our behalf include:

SendInBlue	Mailing software <a href="https://www.sendinblue.com/legal/privacypolicy/">https://www.sendinblue.com/legal/privacypolicy/</a>
Paypal	Transaction Processing / Card Payments <a href="https://www.paypal.com/en/webapps/mpp/ua/privacy-full">https://www.paypal.com/en/webapps/mpp/ua/privacy-full</a>
Sec. Trading	Transaction Processing / Card Payments <a href="https://www.securetrading.com/privacy/">https://www.securetrading.com/privacy/</a>
eKomi	Reviews Management <a href="http://www.ekomi.co.uk/uk/privacy/">http://www.ekomi.co.uk/uk/privacy/</a>

## **Right to Access Data**

You are entitled to view, amend, or delete the personal information that we hold. Email your request to our data protection officer **Ian Walmsley** at:

Ian Walmsley [Commercial Sales Director]

Pozzani Pure Water Ltd, Warwick Road, Louth, Lincs, LN11 0YB

Email: [ian.walmsley@pozzani.co.uk](mailto:ian.walmsley@pozzani.co.uk)

Phone: (44)1507 608100

## **Policy Review**

This policy will be reviewed every six months. The next scheduled review is 1st November 2018.